

COMPANY POLICY

This policy establishes the necessary ethical principles to undertake the MUGAPE activities with honesty and integrity, and in full compliance of the laws and regulations which have been set in the jurisdictions in which MUGAPE conducts its business.

Management would like to communicate to the whole organization the importance of our commitment to satisfying the requirements of our clients and the relevant laws and regulations, as well as the continuous improvement of the effectiveness of the implemented Management System.

We assume different responsibilities within our Corporate Social Responsibility policy:

- With our people: Our company philosophy is clear; we are all equal and must all be treated in a fair and responsible manner under equal conditions. Our Ethical Code is based on these principals.
- With the community: We are close to those around us. Various sponsorships, aid, and cooperation plans are to be carried out in our community.
- With industry: We listen to the needs of our customers, provide them with solutions, and support them at all times. We care about people which is why we strive to form close relationships with our stakeholders. We want to get better and grow as a company, so we ensure all our processes are efficient and effective.
- With the Environment: we want our children to be able to continue enjoying our planet. For this reason, we enforce the prevention, reduction, and elimination of any form of pollution, according to real potential environmental impacts. We protect the environment by using sustainable resources, as well as mitigating and adapting to climate change and focusing on the protection of biodiversity and ecosystems.
- With Workplace Safety: we ensure the safety of all our workers and the proper maintenance of the facilities and equipment we use to develop MUGAPE activities.

Corruption and bribery are an ethical problem which can occur while doing business. By corruption, we refer to the misuse of entrusted power to obtain private benefit. As for bribery, we refer to the illegal or hidden action of granting economic goods in exchange for any form of benefit. Generally, both actions go hand in hand. Extortion occurs when a third party obliges someone under threat to perform or not perform an act which is against their personal integrity or compromises their financial assets and/or those of others.

As a company, MUGAPE ensures that:

- Under no circumstances is bribery and/or extortion permitted. If any person in the company is subject to any kind of illegal proposal or pressure throughout any of their working relationships, whether it be inside or outside the organization, they must report it immediately. Such situations should also be reported should a third party of the company be subjected to extortion and/or bribery.
- It is forbidden by law to bribe public officials or individuals from the private sector (suppliers, customers, and anyone in society in general). We must not, under any circumstances, provide payments, the promise of payment, offers of contracts or employment, gifts, special benefits, or any other object of value in an improper or illegal manner.
- We must be aware that corruption, at any organizational level, harms us not only as a Company, but also society as a whole. Likewise, we must understand that conduct defined as bribery and corruption may involve significant legal penalties as a consequence as well as being harmful to MUGAPE and society.

The MUGAPE Code of Conduct outlines the behaviour expected of all its employees. MUGAPE will carry out its activities objectively, impartially, ethically, and adequately, in full compliance with all applicable laws and regulations and in accordance with MUGAPE Values. In undertaking its commercial activity, integrity must be the basis of all company relationships, that is, with customers, suppliers, communities, and among the employees themselves. MUGAPE employees must adhere to the highest standards of conduct, commitment, and ethics when fulfilling their responsibilities in the company. Employees will not behave or perform activities that could raise doubts about the honesty, impartiality or reputation of the company or, in some way, cause embarrassment to the company.

At MUGAPE, we are responsible to respond to and manage serious incidents that occur in our facilities effectively and adequately through clear, simple, and effective communication channels.

With this objective in mind, we have developed an Escalation Policy to guarantee the correct handling of information and prompt reaction to severe incidents. This is understood as events linked to the health and safety of employees, customers, suppliers or the general public; MUGAPE activities; natural disasters; the damage caused to the image or reputation from MUGAPE breaches of the code of conduct such as financial fraud; past incidents that imply the violation of the security of confidential information for which MUGAPE is responsible and / or the relationships with important clients.