

MNT GROUP LIMITED

CODE OF CONDUCT

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SWAHILI SUMMARY (MUHTASARI)**EMPLOYEE ACKNOWLEDGMENT**

1. INTRODUCTION

1.1 Purpose

This Code of Conduct establishes the standards of behavior and ethical principles expected of all employees of MNT Group Limited. It reflects our commitment to conducting business with integrity, transparency, and respect for all stakeholders.

The Code serves to:

- Define the behavioral expectations and ethical standards for all employees
- Protect the Company's reputation and business interests
- Create a positive, professional, and safe working environment
- Ensure compliance with applicable laws and regulations
- Guide decision-making in challenging situations

1.2 Scope

This Code of Conduct applies to:

- All employees of MNT Group Limited and its subsidiaries
- All employment types: permanent, fixed-term, probationary, and interns
- Directors and management at all levels
- Contractors, consultants, and agents acting on behalf of the Company

The Code applies at all times when conducting Company business, whether on Company premises, at client sites, during business travel, or at Company-sponsored events.

1.3 Core Values Foundation

This Code of Conduct is built upon MNT Group's ten core values and guiding principles:

- **Customer-Centric Excellence** – Your success is our priority
- **Speed, Agility & Market Adaptability** – We move fast and stay ahead
- **Specialized Expertise & Innovation** – Deep knowledge, cutting-edge solutions
- **Operational Excellence & Reliability** – Precision and quality in everything
- **Ethical Business & Trust** – Integrity is how we do business
- **People-First & Leadership Development** – Empowering our people to excel
- **Sustainability & Social Responsibility** – Building a better future responsibly
- **Strategic Partnerships & Global Reach** – Connecting markets, creating opportunities
- **Data-Driven & Performance-Oriented Culture** – Decisions backed by data
- **Health & Wellbeing as a Core Value** – Strong minds, strong bodies, strong businesses

2. PROFESSIONAL CONDUCT AND BEHAVIOR

2.1 Duty of Fidelity

All employees owe a duty of loyalty and fidelity to MNT Group Limited. This fundamental obligation requires employees to:

- Perform duties faithfully, diligently, and to the best of their abilities
- Act in the best interests of the Company at all times during working hours
- Protect the Company's reputation, assets, and confidential information
- Refrain from any action that could harm the Company's business or standing

2.2 Professional Standards

Employees must maintain the highest standards of professionalism:

- a) **Punctuality and Attendance:** Report to work on time and maintain regular attendance. Notify your supervisor promptly if you will be absent or late.
- b) **Quality of Work:** Apply all skills, experience, and effort to perform job responsibilities efficiently and accurately.
- c) **Communication:** Communicate clearly, respectfully, and professionally in all interactions, whether verbal, written, or electronic.
- d) **Teamwork:** Cooperate with colleagues and assist fellow employees when they need support.
- e) **Continuous Improvement:** Seek opportunities for learning and development to enhance job performance.

2.3 Workplace Relationships

Employees must maintain appropriate professional relationships with colleagues, supervisors, and subordinates:

- Treat all colleagues with dignity, respect, and courtesy
- Value diverse perspectives and promote an inclusive environment
- Resolve conflicts constructively through appropriate channels
- Personal relationships must not interfere with professional judgment or create favoritism

2.4 Customer and Client Relations

Our commitment to customer-centric excellence requires employees to:

- Treat all customers and clients with professionalism, courtesy, and respect
- Respond to inquiries and concerns promptly and helpfully

- Never be rude to customers or disconnect customer calls before proper conclusion
- Provide accurate information and avoid making promises that cannot be kept
- Represent the Company positively at client sites and during business interactions

3. ETHICS AND INTEGRITY

3.1 Honesty and Transparency

Integrity is the foundation of our business. All employees must:

- Be truthful and accurate in all business communications and records
- Never falsify documents, records, reports, or expense claims
- Report information accurately to supervisors and management
- Acknowledge mistakes and take responsibility for correcting them

3.2 Fair Dealing

Employees must deal fairly with customers, suppliers, competitors, and colleagues:

- Do not take unfair advantage through manipulation, concealment, or misrepresentation
- Honor all commitments and agreements
- Compete vigorously but fairly in the marketplace
- Respect the rights and property of others, including competitors

3.3 Compliance with Laws

All employees must comply with applicable laws, regulations, and professional standards:

 *Reference: Employment and Labour Relations Act, Cap 366 R.E. 2019; Prevention and Combating of Corruption Act, 2007; Companies Act, Cap 212 R.E. 2019*

- Comply with all Tanzanian laws and regulations applicable to our business
- Follow all Company policies and procedures
- Obtain necessary licenses, permits, and certifications required for your role
- Seek guidance when uncertain about legal or compliance requirements

4. CONFLICT OF INTEREST

4.1 Definition

A conflict of interest occurs when an employee's personal interests interfere with, or appear to interfere with, the interests of the Company. This includes situations where:

- Personal gain could be obtained at the Company's expense
- Personal relationships could influence business decisions
- Outside activities could affect job performance or judgment

4.2 Prohibited Conflicts

Employees must avoid situations that create actual or potential conflicts:

- f) **Competing Interests:** Do not have ownership or financial interest in any enterprise that competes with MNT Group (except non-controlling investments in publicly-traded corporations).
- g) **Supplier/Customer Relationships:** Do not have undisclosed business relationships with Company suppliers, vendors, or customers.
- h) **Personal Transactions:** Do not conduct personal business transactions with the Company without proper disclosure and approval.
- i) **Family Employment:** Disclose family relationships with potential or current employees, suppliers, or customers.

4.3 Disclosure Requirements

Employees must promptly disclose to the Company material information regarding:

- Any relationship, ownership, or business interest that could create a conflict
- Changes in personal circumstances that could affect the conflict assessment
- Any situations where personal interests may influence business decisions

{HR Guidance} Employees should submit conflict of interest disclosures in writing to their supervisor and HR department for review and determination.

4.4 Outside Employment and Business Activities

During working hours, employees are expected to devote their full time and attention to Company business. If any employee wishes to engage in employment or business activity outside their employment with MNT Group:

- The employee must first disclose the nature and extent of the proposed activity

- Written approval from the Company must be obtained before commencing such activity
- Approval may be withheld if the activity could conflict with Company interests or negatively affect job performance

5. CONFIDENTIALITY AND DATA PROTECTION

5.1 Confidential Information

Confidential Information includes, but is not limited to:

- Business strategies, plans, forecasts, and financial information
- Customer lists, supplier information, and business relationships
- Technical data, research, development information, and proprietary methods
- Marketing strategies, pricing information, and competitive analyses
- Personnel information and internal policies
- Industrial designs, inventions, and production methods
- Any information about MNT Group subsidiaries and their operations

5.2 Protection Obligations

Employees must protect confidential information as follows:

- j) **Non-Disclosure:** Never disclose confidential information to anyone outside the Company without express written authorization.
- k) **Need-to-Know:** Share confidential information internally only with those who need it to perform their duties.
- l) **Physical Security:** Secure confidential documents, files, and materials when not in use.
- m) **Electronic Security:** Use strong passwords, protect devices, and follow IT security protocols.
- n) **Duration:** Confidentiality obligations continue even after employment ends.

5.3 Data Privacy

Employees who handle personal data must:

- Collect and process personal data only for legitimate business purposes
- Protect personal data from unauthorized access, use, or disclosure
- Retain data only for as long as necessary and dispose of it securely
- Report any data breaches or suspected breaches immediately to IT and management

6. ANTI-CORRUPTION AND BRIBERY

 Reference: *Prevention and Combating of Corruption Act, 2007 (Tanzania); Prevention and Combating of Corruption Bureau (PCCB) Regulations*

6.1 Zero Tolerance Policy

MNT Group maintains a zero tolerance policy toward corruption and bribery in all forms. Corruption undermines fair competition, damages our reputation, and violates the law. All employees must conduct business without engaging in any form of corrupt practices.

6.2 Prohibited Activities

The following activities are strictly prohibited:

- o) **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence a business decision or official action.
- p) **Kickbacks:** Receiving any portion of a contract payment or other benefit in return for business favors.
- q) **Facilitation Payments:** Payments to government officials to expedite routine actions.
- r) **Fraud:** Misappropriation of organizational funds or falsifying records.
- s) **Extortion:** Demanding money or benefits under threat.

6.3 Gifts and Entertainment

Employees must exercise caution when giving or receiving gifts and entertainment:

- Gifts must be of nominal value (not exceeding TZS 100,000) and given openly without expectation of return
- Never accept cash or cash equivalents as gifts
- Entertainment must be reasonable, occasional, and serve a legitimate business purpose
- Never give or accept gifts that could create an obligation or expectation
- Disclose any gifts received exceeding nominal value to your supervisor

{HR Guidance} Employees uncertain about the appropriateness of a gift should consult their supervisor or HR before accepting.

6.4 Reporting Suspected Corruption

Employees who become aware of potential corruption must report it immediately through the channels described in Section 9 of this Code. Reports can be made confidentially, and employees are protected against retaliation for good-faith reporting.

7. COMPANY PROPERTY AND RESOURCES

7.1 Use of Company Assets

Employees are responsible for the proper use and safekeeping of Company property:

- t) **Business Use:** Company property and resources are for approved business purposes only. Personal use is not permitted without authorization.
- u) **Care and Maintenance:** Take reasonable care of all Company property entrusted to you. Report any damage, loss, or malfunction promptly.
- v) **Return of Property:** All Company property must be returned in good condition upon request or upon termination of employment.
- w) **Liability:** Employees may be held liable for loss or damage to Company property caused by negligence or misuse.

Company property includes but is not limited to: computers, phones, vehicles, tools, equipment, uniforms, keys, access cards, and documents.

7.2 Electronic Systems and Communications

Company electronic systems and communications are subject to the following rules:

- Email is primarily for work purposes. Employees are responsible for effective use and regular checking throughout the working day.
- Do not use Company systems for illegal activities, harassment, or inappropriate content
- Use of mobile phones while attending to business duties may be restricted in certain roles
- The Company reserves the right to monitor electronic communications and internet usage
- Social media use must not harm the Company's reputation or disclose confidential information

7.3 Intellectual Property

All intellectual property created during employment belongs to the Company:

- Work products, inventions, designs, and materials created in the course of employment are Company property

- Employees must disclose any inventions or innovations developed during employment
- Do not infringe on third-party intellectual property rights

8. WORKPLACE CONDUCT

8.1 Anti-Harassment and Discrimination

 Reference: Section 7, Employment and Labour Relations Act, Cap 366 R.E. 2019 - Prohibition of discrimination in employment

MNT Group is committed to providing a workplace free from harassment and discrimination. The following conduct is strictly prohibited:

- Discrimination based on race, color, religion, sex, national origin, age, disability, marital status, or any other protected characteristic
- Sexual harassment including unwelcome advances, requests for sexual favors, or verbal/physical conduct of a sexual nature
- Bullying, intimidation, threats, or any form of workplace violence
- Offensive jokes, slurs, or derogatory comments
- Creating a hostile, intimidating, or offensive work environment

Any employee who experiences or witnesses harassment should report it immediately through the channels described in Section 9.

8.2 Health, Safety, and Wellbeing

 Reference: Occupational Safety and Health Act No. 5 of 2003 (OSHA Tanzania)

Employees must prioritize health and safety in all activities:

- Follow all safety procedures and protocols
- Use required personal protective equipment (PPE) especially for electrical work
- Report accidents, injuries, or unsafe conditions immediately
- Never endanger your own safety or the safety of others
- Participate in required safety training

8.3 Alcohol and Substance Abuse

MNT Group maintains a zero tolerance policy regarding alcohol and drug abuse:

- Consuming alcohol or drugs while on duty is strictly prohibited

- Being under the influence of alcohol or drugs while on duty is prohibited
- Possession, sale, or distribution of illegal substances is prohibited
- Violations may result in immediate termination and reporting to authorities

8.4 Dress Code and Professional Appearance

The Company expects employees to dress appropriately and maintain professional appearance:

- Professional business attire is required in the office and during client interactions
- Appropriate safety attire is required for field and site work
- Employees should demonstrate good judgment and professional taste
- Company uniforms, when provided, must be worn and maintained properly

Smoking is strictly not permitted in the office at any time, except in designated areas.

9. REPORTING AND WHISTLEBLOWING

9.1 Duty to Report

All employees have a duty to report actual or suspected violations of this Code, Company policies, or applicable laws. Reporting protects the Company, its employees, and stakeholders from harm.

Reportable matters include, but are not limited to:

- Violations of this Code of Conduct
- Suspected fraud, theft, or misappropriation
- Corruption or bribery
- Harassment or discrimination
- Safety violations or hazards
- Breaches of confidentiality

9.2 Reporting Channels

Employees may report concerns through any of the following channels:

- **Direct Supervisor:** First point of contact for most concerns
- **Human Resources Department:** For employment-related matters and policy violations
- **Senior Management:** For serious matters or when other channels are inappropriate
- **Company Email:** info@mntgroup.net for written reports

{HR Guidance} All reports will be treated confidentially to the extent possible. Employees may request to report anonymously where permitted by law.

9.3 Protection Against Retaliation

MNT Group prohibits retaliation against any employee who in good faith:

- Reports a suspected violation of this Code or applicable laws
- Participates in an investigation of a reported violation
- Refuses to participate in activities that violate this Code

Retaliation is a serious violation of this Code and may result in disciplinary action up to and including termination.

10. ENFORCEMENT AND CONSEQUENCES

10.1 Violations

Violations of this Code of Conduct are taken seriously and may include:

- Direct violations of Code provisions
- Requesting or instructing others to violate the Code
- Failure to report known violations
- Retaliating against those who report violations
- Failing to cooperate with investigations

10.2 Disciplinary Actions

Violations may result in disciplinary action, which will be proportionate to the severity of the violation and may include:

- Verbal or written warning
- Mandatory retraining
- Suspension with or without pay
- Demotion or transfer
- Termination of employment
- Referral to law enforcement where appropriate

 *Reference: Disciplinary actions will be conducted in accordance with Sections 37-41 of the Employment and Labour Relations Act, Cap 366 R.E. 2019*

10.3 Investigation Process

All reported violations will be investigated fairly and thoroughly:

- Reports will be reviewed promptly and confidentially
- Investigations will be conducted impartially by appropriate personnel
- Accused employees will have the opportunity to respond to allegations
- Documentation will be maintained in accordance with Company policy
- Outcomes will be communicated to relevant parties

EMPLOYEE ACKNOWLEDGMENT

I acknowledge that I have received, read, and understood the MNT Group Limited Code of Conduct. I understand that:

- This Code sets forth the standards of conduct expected of me as an employee.
- I am required to comply with this Code and all Company policies.
- I have a duty to report any violations of this Code.
- Violation of this Code may result in disciplinary action, up to and including termination.
- This Code may be amended from time to time by the Company.

Employee Name:	Signature:
Position:	Date:
Department:	Witness:

{HR Guidance} HR Department: File signed acknowledgment in employee's personnel file. Provide copy to employee upon request.

DOCUMENT CONTROL

Version	Date	Author	Changes
1.0	1st January 2026	HR Department	Initial Release