

MCI's COMPLIANCE CHARTER

POLICY STATEMENT

*The Directors and Management of MCI are committed to compliance with all relevant policies and regulations respectively related to **ethical business practices**, the **security of all data**, and the **protection of the “rights and freedoms”** of individuals whose information MCI collects and processes in accordance with **all relevant regulations**.*

INTRODUCTION

MCI is committed to conducting its business with the **highest standards** of **integrity, transparency**, and **accountability**. This **Compliance Charter** outlines MCI's approach to **regulatory compliance**, **ethical conduct**, and **risk management**, and reflects our dedication to operating in a manner that **protects** our **clients, employees, partners**, and **stakeholders**.

As a **trusted technology partner** delivering enterprise software solutions and digital transformation services, MCI recognises that **compliance** is **fundamental** to **sustainable business success** and **customer service excellence**.

PURPOSE OF THE CHARTER

The purpose of this **Charter** is to:

- **Define MCI's commitment** to **compliance** and **ethical** business practices
- **Establish a framework** for **identifying, managing**, and **mitigating compliance risks**
- **Ensure alignment** with **applicable laws, regulations**, and **industry standards**
- **Promote a culture** of **accountability, responsibility**, and **continuous improvement**
- **Reinforce trust** with **clients, partners**, and **regulatory bodies**

SCOPE

This **Charter** applies to:

- All **MCI** employees, directors, and contractors
- All business units and service offerings
- All systems, processes, and **client** engagements
- Third-party service providers and partners acting on behalf of **MCI**

COMPLIANCE FRAMEWORK

MCI maintains a **structured compliance framework** aligned to **recognised best practices**, including principles from the **NIST Cybersecurity Framework** and corporate governance guidance such as **King IV Report on Corporate Governance**.

Our **Compliance Framework** includes:

- **Policy Governance:** A comprehensive suite of **policies** covering **information security, data privacy, access control, software development, risk management,** and **business continuity**
- **Risk Management:** Ongoing **identification, assessment,** and **mitigation** of compliance and operational **risks**
- **Internal Controls:** Clearly defined **processes** and **controls** embedded within **SOPs** and operational workflows
- **Monitoring & Reporting:** **Continuous monitoring** of **compliance performance** and **incident tracking**
- **Audit & Review:** **Regular internal** and **external reviews** to ensure **adherence** and **effectiveness.**

REGULATORY COMPLIANCE

MCI is committed to complying with **all applicable laws** and **regulations**, including but not limited to:

- **POPIA** (data protection and privacy)
- **Cybercrimes Act** (cybersecurity and digital offences)
- **Companies Act 2008** (corporate governance and accountability)

Where **MCI** operates as a **Service Provider** (Operator), we ensure compliance with **client-specific regulatory obligations** and **contractual requirements.**

INFORMATION SECURITY & DATA PROTECTION

MCI is committed to **safeguarding all information assets** through:

- **Implementation** of **robust information security controls**
- **Protection** of **personal** and **sensitive data** through **secure processing, storage,** and **transmission**
- Use of **encryption, access controls,** and **monitoring tools**
- Alignment with **client** and industry **security standards** and **frameworks**
- **Strict adherence** to **data privacy principles,** including **lawful processing** and **data minimisation.**

ETHICAL CONDUCT

MCI promotes a culture of **ethical behaviour** guided by:

- **Honesty, integrity,** and **professionalism**
- Zero tolerance for **fraud, bribery, and corruption**
- **Fair** and **transparent** dealings with **clients, partners,** and **employees**
- **Responsible use** of **company** and **client resources**

All employees are expected to act in accordance with **MCI's Code of Conduct** and **report** any unethical or non-compliant behaviour.

ROLES AND RESPONSIBILITIES

- **Board and Leadership:** Provide oversight and ensure that compliance is embedded within the organisation's strategy and operations
- **Management:** Implement policies, enforce controls, and ensure adherence across all business functions
- **Employees and Contractors:** Comply with all **policies, procedures**, and **applicable regulations**, and actively contribute to a compliant environment
- **Compliance Function:** Monitor, advise, and support the organisation in **maintaining compliance** and **managing risks**

THIRD-PARTY COMPLIANCE

MCI requires all **third-party vendors** and **partners** to:

- Adhere to **applicable legal** and **regulatory requirements**
- Maintain appropriate **security** and **data protection controls**
- Comply with **MCI's policies** and **contractual obligations**
- Undergo **due diligence** and **ongoing monitoring** where applicable

INCIDENT MANAGEMENT & REPORTING

MCI maintains formal processes to:

- **Identify, report**, and **manage compliance** and **security incidents**
- Maintain an **incident register** and **audit trail**
- **Escalate** and **resolve issues** in a timely and controlled manner
- **Notify affected parties** and **regulators** where required

TRAINING & AWARENESS

MCI ensures that **all employees** receive:

- Ongoing **compliance** and **risk management training**
- Awareness of **policies, procedures**, and **regulatory obligations**
- **Updates** on **emerging risks, threats**, and **regulatory changes**

CONTINUOUS IMPROVEMENT

MCI is committed to **continuously improving** its compliance posture through:

- Regular **policy reviews** and **updates**
- Monitoring of **regulatory developments**
- **Lessons learned** from incidents and audits
- Adoption of **industry best practices** and **technologies**

COMMITMENT TO STAKEHOLDERS

MCI is committed to:

- **Protecting client data** and **maintaining confidentiality**
- Delivering **secure, reliable**, and **compliant solutions**
- Building **long-term relationships** based on **trust** and **accountability**
- **Supporting clients** in meeting their **own compliance obligations**

APPROVAL AND REVIEW

This **Compliance Charter** is approved by **MCI's** leadership and is **reviewed periodically** to ensure **ongoing relevance** and **effectiveness**.

CONCLUSION

Compliance at **MCI** is not only a **regulatory requirement** but a **core component of our value proposition**. Through this **Charter, MCI** reaffirms its **commitment** to operating **responsibly, securely**, and **ethically**, ensuring that **all business activities** align with **the highest standards** of **governance** and **customer service excellence**.