

MCI 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 applies **governance** and **compliance principles** proportionately, taking into account MCI's **size, organisational structure, nature, complexity, business activities, risk profile** and applicable **legal** and **regulatory obligations**, and including principles from the **NIST Cybersecurity Framework** and the **King V Code on Corporate Governance for South Africa**

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, treatment, monitoring and reporting** of **compliance, information security, technology, operational** and other material **organisational risks**, with **compliance risk integrated** into the broader **Enterprise Risk Management Framework**.
- **Internal Controls:** Clearly defined **processes** and **controls** embedded within **SOPs** and operational workflows
- **Monitoring & Reporting:** **Continuous monitoring** of **compliance performance** and **incident tracking**
- **Audit, Assurance & Review:** Regular **internal** and, where appropriate, independent **external reviews** and **assurance activities** to assess the effectiveness of the **Compliance Framework, controls** and **governance arrangements**.

KING V GOVERNANCE AND COMPLIANCE ALIGNMENT

MCi recognises the **King V Code on Corporate Governance** for South Africa as a **principles-based framework** for **ethical and effective governance** and, where **applicable** and **proportionate** to **MCi's circumstances**, seeks to support the **achievement** of the **King V governance outcomes** of **ethical culture, performance and value creation, conformance and prudent control, and legitimacy**.

In alignment with **King V Principle 9**, **MCi** retains **accountability** for **maintaining** an **effective organisation-wide system** of **compliance** as an **integral component** of its broader **enterprise risk management, internal control and governance** arrangements.

MCi's Compliance Function supports this responsibility by **maintaining** the **Compliance Framework** by:

- **Identifying** and **assessing compliance risks**
- **Monitoring the regulatory environment**
- **Advising management and leadership** on **compliance obligations**
- **Coordinating compliance monitoring and reporting;** and
- **Facilitating appropriate remediation and escalation**.

Through these arrangements, **MCi** seeks to **promote effective compliance, risk management, information security, data protection, internal control and stakeholder engagement**, taking into account not only the **obligations** arising from **applicable laws and regulations**, but also the **rights** and **protections** afforded by those requirements.

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 & TECHNOLOGY GOVERNANCE

MCI recognises that effective governance of **data, information** and **technology** is integral to **organisational resilience, regulatory compliance, information security** and sustainable **business performance**. In alignment with **King V Principle 10**, **MCI** seeks to ensure that **data, information and technology** are **managed** in an **effective, compliant** and **ethical manner**, with appropriate **governance, risk management, security, privacy, third-party oversight** and **assurance** arrangements.

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**.
- **Monitoring emerging technology developments**, including **artificial intelligence**, and assess associated **legal, ethical, information security, privacy** and **operational risks** as appropriate to its activities.

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 **MCI'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 recognises the importance of a **stakeholder-inclusive** approach and considers the **legitimate interests** and **expectations** of **relevant stakeholders** in its **governance, compliance** and **decision-making processes**.

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**. Where **MCI** elects to claim application of **King V**, **governance disclosures** will be prepared with reference to the **King V Disclosure Framework** and will be **reviewed periodically** to **ensure** that **disclosures** accurately reflect **MCI's governance practices** and **outcomes**.

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**.