

Corporate Social Responsibility Policy



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1. Company Introduction

The MAT Foundry Group strives to be a good corporate citizen in all aspects of its operations and activities. We have therefore determined to bring together our existing operating principles into one framework policy under the heading Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the Group's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards.

The MAT Foundry Group Board of Directors supports the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for all subsidiaries of MAT Foundry Group and provide practical guidance for our Managers and employees on the ground.

2. Ethical Business Conduct

This code applies to all of the operations of MAT Foundry Group and its subsidiaries and sets out the minimum standard which the Board of MAT Foundry Group expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

2.1 Basic Standards of Conduct

- a) We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interest of our employees, customers and third parties.
- b) We will maintain the highest standards of integrity for example we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

2.2 Employees

Each MAT Foundry Group Company: -

- a) Is committed to creating and maintaining a safe and healthy working environment for its employees.
- b) Will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- c) Will respect the individual and each other's rights, customs and traditions, including the right to freedom of association and the right to join a trade union.
- d) Will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.

2.4 Business Partners and Stakeholders

- a) We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- b) In those dealings, we expect our partners to adhere to business principles consistent with our own.

- c) MAT Foundry Group companies will conduct their operations in accordance with the principles of fair competition and applicable regulations.

2.5 Compliance with Law

- a) All MAT Foundry Group companies will comply with the laws and regulations applicable wherever they do business.

2.6 Business Integrity

- a) No MAT Foundry Group company shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain.
- b) MAT Foundry Group accounting and other records and supporting documents must accurately describe and reflect the nature of underlying transactions.
- c) No undisclosed or unrecorded account, fund or assets will established or maintained.

2.7 Conflicts of Interest and Confidentiality

- a) The MAT Foundry Group respects the privacy of its employees, however all employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to the MAT Foundry Group or its subsidiaries.
- b) All actual or potential conflict of interests should be declared with the employee's line manager.
- c) Where information is confidential, that confidentiality must be respected.

3. Employment

3.1 Compliance with Codes and Regulations

In addition to the MAT Foundry Group's internal operating principles employees shall adhere to all national laws and regulations.

3.2 Equal Opportunities and Diversity

In formulating its employment policies the MAT Foundry Group is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its guidelines for Multinational Enterprises.

The guidelines encourage companies to foster openness, sustainability and respect for employee's rights. Our employment policies cover all employees of MAT Foundry Group and its subsidiaries.

- a) The Board of Directors is committed to providing equal opportunities to all workers and job applicants. No employee or job applicant shall receive less favourable treatment on the grounds of sex, marital status, sexual orientation, race, colour, religion or belief, nationality or ethnic or national origin. The company will not treat any employee or job applicant less favourably for a reason relating to their disability or part time or fixed term status unless this can be justified. The Group will also take all reasonably practical steps to ensure that disabled applicants or workers are able to participate in its business activities on an equal basis with people who are not disabled.
- b) All employees have a personal responsibility for the practical application of this policy in their day to day activities and ensuring that the standards of behaviour required by the company are observed.
- c) Noncompliance with this policy will not be tolerated and employees who fail to comply with this policy will be subject to the company's disciplinary policy.
- d) The Human Resources departments carry out periodic reviews of the company's equal opportunity policy and monitors effects and the application of this policy.

3.3 Human Rights

The MAT Foundry Group supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. The Group will adhere to the following principles in respect our staff: -

- a) MAT Foundry Group and its subsidiaries will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law and will be given appropriate job skills training.
- b) MAT Foundry Group and its subsidiaries will pay a fair wage reflecting local markets and conditions and will always meet any national minimum wage.
- c) Working hours shall not be excessive, they shall comply with industry guidelines and national standards where they exist.
- d) Employees of the MAT Foundry Group and its subsidiaries have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management.
- e) We will negotiate in good faith with the properly elected representatives of our employees.
- f) We will abide by the non-discrimination laws in every country where we operate.
- g) We have formal grievance procedures through which staff can raise personal and work related issues.
- h) All staff will be given reasonable access to bathroom and rest facilities.

3.4 Forced / Child Labour

The MAT Foundry Group does not employ or condone the employment of forced or child labour of any kind. The group adheres strictly to country laws governing labour standards.

3.5 Data Protection

We will comply with the relevant principles governing data protection in each of the countries that MAT Foundry Group and its subsidiaries operate in.

4. Customer and the Community

4.1 Customers.

The MAT Foundry Group will: -

- a) Act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services.
- b) Respect the human rights of our customers
- c) Not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair.
- d) Respect our customer's privacy and provide protection for their data in accordance with relevant local law.

4.2 Community

The relationship between MAT Foundry Group and its subsidiaries and their local community is an essential part in the growth of the business. Through our community strategy we therefore engage with the community at a range of levels as neighbours, potential employees, business and residents. In line with our core values, our corporate strategy incorporates the following elements: -

- a) Offering employment opportunities to all sectors of the community through non-discriminatory policies.
- b) Supporting the local community groups and charities.
- c) Promoting engagement between staff and the community.
- d) Improving the environment in and around our operations.
- e) Working closely with local law enforcement agencies to address anti-social behaviour, crime and vandalism.

5. Workplace Health and Safety

5.1 Health and Safety Policy

The health and safety of our employees and all visitors to our operations is top priority and underpins all our operations. The MAT Foundry Group has developed the following high level safety policy and all subsidiaries are required to comply with local health and safety regulations whilst adopting the high level health and safety policy.

- a) MAT Foundry Group's Board of Directors are committed to ensuring, so far as reasonably practicable, the health, safety and welfare of all its employees at work and also others.
- b) The health and safety policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. This is based on the principles that: -
 - All injuries can be prevented.
 - The goal is zero injuries
 - Safety is the responsibilities of all employees.
 - Working safely is a condition of employment.
- c) The CEO's and General Managers of each MAT Foundry Group subsidiary are tasked to ensure that so far as reasonably practicable: -
 - Adequate arrangements and organisation for health and safety are in place within their area of responsibility.
 - Responsibilities for carrying out these arrangements are clearly allocated.
 - All staff are given appropriate information, instruction and training.
 - Adequate supervision is provided to ensure compliance with polices and safe systems of work.
 - All other legal and statutory duties on health and safety incumbent upon MAT Foundry Group subsidiaries are complied with in all their operations and locations.
 - Adequate resources are allocated and competent persons are appointed to support the achievement of the above objectives.

- d) All companies will continually monitor the health and safety performance of our operations which will be subjected to periodic safety audits to assess performance. The nominated Managers will
- Report on health and safety to their Executive Management Team.
 - Report to the Board all fatal and notifiable injuries to staff or other persons within 24 hours.

6. Environmental

6.1 Environmental Policy

The MAT Foundry Group understands that its activities affect the environment and the communities in which we operate. We believe that we have a responsibility to identify and manage these impacts as effectively as possible. We are committed to continually improving our environmental performance and moving towards best practices in corporate sustainability.

- a) The CEO's and General Managers of each MAT Foundry Group subsidiary are tasked to ensure that so far as reasonably practicable: -
- Preventing pollution and reducing the overall impact of our operations on the environment.
 - Maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment.
 - Complying with and where possible exceeding applicable legal and other requirements relating to the organisation.
 - Monitoring our environmental performance and setting objectives and targets for improvement.
 - Providing appropriate training and awareness programmes for our staff.
- b) As part of the Group's commitment all facilities will have an Environmental Policy as a minimum and where applicable they will obtain registration to the International Environmental Standard ISO 14001 through a recognised and certified body.

6.2 Energy Policy

As an intensive energy user the MAT Foundry Group is committed to reducing its carbon footprint our key commitments are: -

- a) Assess the potential impact to our business from changing energy polices.
- b) Work actively with our suppliers to improve the efficiency of our operations.
- c) Report annually on our energy performance.
- d) Actively promote improved energy efficiency within our business.
- e) Look to use green energy wherever possible.

7. Supply Chain Management

7.1 Ethical Procurement Policy

As a Group we purchase a wide range of goods and services required in the operation of our business and rely heavily on a number of key suppliers for the delivery of our core requirements. As part of our procurement strategy we expect our supply chain to comply with our CSR policy as a minimum and integrate these throughout their supply chain.

- a) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.
- b) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.
- c) More specifically we expect our suppliers to: -
 - Adhere to business principles consistent with our own.
 - Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
 - Seek to maintain continuous improvement in their supply chain relationship with us.
 - Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.
- d) We will seek to work with our key suppliers to: -
 - Develop long-term meaningful relations to the benefit of both parties.
 - Improve quality, environmental performance and the sustainability of goods and services where this can be achieved to the benefit of both parties.