

## **KROPZ'S ANTI-CORRUPTION POLICY AND CODE OF ETHICS**

### **KROPZ'S COMMITMENT TO STAMPING OUT BRIBERY AND CORRUPTION**

The Board of Directors and all in senior management at Kropz are absolutely committed to ensuring that Kropz plc and its subsidiaries ("Kropz") and all of its employees conduct their business in an honest and ethical manner.

In furthering this goal, it is important that all employees assist the Board by:

- Upholding both the letter and the spirit of all national and international laws and regulations;
- Doing nothing that would diminish Kropz's reputation as a moral organisation which carries out its business fairly and with integrity;
- Following this Anti-Corruption Policy and Code of Ethics strictly, thus reducing the risks not only of direct, but also indirect, involvement in corrupt practices; and
- Reporting any instances of such practices that are taking place.

The Board cannot achieve this goal without the collective commitment of everyone at Kropz and we would ask that each person play their part. Bribery and corruption is not just something that can damage our business and reputation. In many countries it is illegal and subject to extremely severe criminal penalties. The Board has prepared this policy to help you conduct your business activities in a way which reduces the risks of any criminal or civil liability for acts of corruption.

Please help us maintain Kropz as an example of how an honest and ethical company should be run.

Yours sincerely,



Chief Executive Officer

## 1. KROPZ'S ANTI-BRIBERY OBJECTIVES

- 1.1 Kropz has a strict zero-tolerance policy to bribery and corruption in relation to all of its business activities.
- 1.2 This policy applies to all Kropz's employees, directors and officers, from senior management to the newest joiners. It will also apply to anyone representing Kropz as well as employees.
- 1.3 Kropz considers bribery and corruption to include any payment of value, no matter how small or incidental, made to and/or received by any person with the intention and/or effect of improperly influencing their decision making process and to gain a direct or indirect advantage for Kropz or the person making the payment.
- 1.4 Acts of bribery and corruption will be illegal in most areas in which Kropz operates. Whether or not illegal under the national laws of the country in which the business activity takes place, these acts may be offences under laws with an international reach, such as the United States' Foreign Corrupt Practices Act 1977 or the United Kingdom's Bribery Act 2010. Kropz works from the assumption that any act of bribery or corruption is illegal.
- 1.5 Acts of bribery and corruption go against the high moral and ethical standards with which Kropz conducts its business. Therefore, it will be no defence for any employee to show that any corrupt acts would not be punishable by law if such an act was still contrary to Kropz's Code of Ethics.
- 1.6 The purpose of this policy is to:
  - Set out how Kropz implements its zero-tolerance policy in practice;
  - Explain what Kropz requires of its employees and people carrying out business on its behalf in order to achieve this;
  - Provide the information that employees who witness acts of bribery and corruption need to report such acts to the relevant people; and
  - Detail Kropz's ongoing commitment to implementing and updating this policy, and providing training on it to all employees.

- 1.7 This policy is fully endorsed and supported by the Board of Kropz who are absolutely committed to zero-tolerance of bribery and corruption within the business.

*Examples of what might be a 'bribe':*

- *Providing a government official with cash or gifts so that Company X can obtain a licence to operate in that country.*
- *Providing over-the-top hospitality to a government official, client or potential client on the understanding that, in return, their employer will do or continue to do business with Company Y.*
- *Paying an agent much more than the market rate on the back of his "guarantee" that he will resolve any legal or commercial issues relating to Company Z's business activities in the region. The suspicion would be that the extra commission will go to pay bribes.*

## 2. ASSESSING AND MITIGATING THE RISKS

- 2.1 Every employee should focus their attention on considering what risks of corruption their business activities give rise to, and how these risks can be avoided or reduced.
- 2.2 Different business activities will involve different levels of risk of bribery and corruption. Every employee will have to give careful thought as to how great a risk what they are doing poses. Whilst every employee has an obligation, those in management positions have a particular responsibility for ensuring that risks are identified, assessed and mitigated.
- 2.3 In doing this, employees will have to consider the following questions in relation to all activities:
- What is the business activity I am engaged in?
  - In which countries will it be taking place?
  - Who will be involved (is it other employees at Kropz and/or third parties)? For example, does it involve interfacing with any government employees?
- 2.4 A lot of the commercial activities carried out by Kropz are in sectors considered as carrying a higher than average risk of bribery and corruption as they are in the mineral

extraction sector. For this reason, all employees must be extra vigilant when assessing potential, and spotting actual, instances where improper practices might be taking place amongst those with whom we do business.

- 2.5 While it is important to consider the potential risks of corruption no matter where the business activity takes place, some countries will carry with them a higher risk than others. Employees are encouraged to consult the Chief Financial Officer or the Group Legal Officer to discuss the level of risk when conducting business in a new country. Kropz will have regard to Transparency International’s Corruption Perception Index when considering business risk with its clients.
- 2.6 Kropz has appointed two senior members of the management team to implement and monitor Kropz’s anti-corruption policy and code of ethics (see Appendix 4). In this policy, these members of the management team are referred to collectively as “the Responsible Officer.”
- 2.7 As a general guide, Figure 1 sets out the countries in which most of Kropz’s business is currently carried out and identifies whether those counties carry a low or high risk of corruption.

Figure 1. As from Transparency Internationals Corruption Perception Index August 2011.

Low Risk	Medium to High Risk
<ul style="list-style-type: none"> <li>• United Kingdom</li> </ul>	<ul style="list-style-type: none"> <li>• Congo</li> <li>• Ghana</li> <li>• South Africa</li> </ul>

- 2.8 The potential risk of corruption will also vary depending on who else is involved in the business activity. Some business relationships are riskier than others, and this is something that all employees must consider when assessing risk. Employees should be particularly careful when dealing with:

- Agents dealing with public officials;

- Business partners operating through joint ventures with Kropz;
- Individuals with political affiliations or who have a prominent public profile; or
- Individuals or companies which have been the subject of negative publicity.

2.9 If this assessment of risks flags any issues, the employee must consider what can be done to reduce the potential risks before carrying out the business activity. In extreme cases Kropz may have to refuse to carry out the activity or terminate the relationship with a business partner if they appear to carry a high level of risk and those risks cannot be mitigated. Any such issues should be discussed with the Responsible Officer before any final decision is made.

2.10 Kropz is committed to conducting a risk assessment across its business and will be implementing a rolling programme of assessment of its existing business partners. Kropz is seeking to move to a position where all of the contracts with its service providers will contain a warranty that the providers will not make or receive improper payments and will comply with the UK Bribery Act 2010 and any local anticorruption laws which might apply.

*Example of a Low Risk Business Relationship:*

*Company A appoints a well-known, multi-national IT company based in the United States to provide support services for its networks. Company A has known the company for many years and knows that the remuneration amount and payment method are very standard for that industry. Company A may know that the IT company has standard terms and conditions which contain anti-corruption provisions.*

*Example of a High Risk Business Relationship:*

*Company B needs a permit in order to be able to operate in a South American country. These permits are difficult for companies to get but an agent approaches a Company B's employee and offers to procure one for a fee paid in USD cash.*

### 3. DEALING WITH THIRD PARTIES

3.1 It is vital that all employees not only follow the guidance of this policy to avoid being involved directly in acts of bribery and corruption but also take practical steps to ensure that no third party with which they do business is involved in any corrupt acts or activities.

- 3.2 In certain circumstances, Kropz will not only be liable for being directly involved in corruption, but may also be liable for such acts committed by third parties.
- 3.3 Employees should look into the specific risks that dealing with each third party poses. This will involve carrying out due diligence on all new and existing business partners, proportionate to the perceived level of risk of corruption.
- 3.4 As part of this due diligence, employees should consider:
- The location of the third party;
  - The nature and value of the services being provided;
  - The level and timing of any due diligence previously carried out on the third party and what the due diligence showed;
  - The size and value of the business;
  - The extent to which the third party will be dealing with government or public officials and bodies; and
  - If there is anything unusual about the nature of the relationship, including remuneration.
- 3.5 For these purposes, relevant third parties may include (but are not limited to) consultants, contractors, subsidiaries or controlled entities, joint venture partners, advisors, distributors, agents or intermediaries.
- 3.6 If any analysis of risk raises any red flags for corruption, thorough due diligence should be carried out on that person or organisation immediately. This due diligence may aim to establish:
- The business partner's full, legal name, registered address and company number or equivalent.
  - Details of the business partner's shareholdings and shareholders, including wholly and partly owned subsidiaries or parent companies.
  - A list of the business partner's directors and officers, and any other employees who will be carrying out services for the organisation, including providing CVs, proof of citizenship, relationships with any *politically exposed persons*, references where appropriate and details of other companies in which they are involved.
  - Details of other clients of the business partner or parties with whom they regularly do business (especially public officials and government bodies) and how the business was obtained.

- Financial information, including accounts and annual reports as well as details of any history of insolvency of the business partner and any of its directors.
  - Details of any legal proceedings or regulatory investigations involving the business partner or any of its key personnel, with particular focus on matters involving allegations of corruption.
  - The precise nature of the intended relationship with the business partner, what services it intends to provide, how and by whom these services will be provided and how it is going to calculate what remuneration it receives for doing so.
  - What, if any, anti-bribery and corruption policies and procedures the business partner has in place and what due diligence it carries out on third parties with which it does business.
- 3.7 As from the date of this policy, Kropz will be conducting due diligence on new business partners. As part of this, employees will be asked to complete a copy of the questionnaire as part of the processes outlined in Appendix 1. The business partners may also be asked for information. Due diligence will also, on a rolling basis following the implementation of this policy, be carried out on existing business partners, ordered according to the level of assessed risk each relationship poses. Any red flags identified by this due diligence will give rise to further scrutiny.
- 3.8 In no circumstances will Kropz enter into any legal relationship with a third party without there being a written contract in place. No payments to third parties may be made unless such a contract governs the relationship.
- 3.9 Any written contract will contain an express covenant by the third party not to pay, receive or solicit bribes and to abide by all applicable laws.
- 3.10 Kropz will provide training to relevant employees on the circumstances in which such due diligence will be required and how to gather this information. For any specific questions, employee should contact the Responsible Officer.

#### 4. FACILITATION PAYMENTS

- 4.1 Kropz understands that in certain countries and industries, the use of facilitation payments is commonplace and seen by some as a necessary part of carrying out business.

- 4.2 A facilitation payment is a small payment made with intention or effect of speeding up obtaining something that you would, in any event, be entitled to. For example, paying an official to be able to get a licence in two weeks, when it would have otherwise taken two months.
- 4.3 Nevertheless, it is Kropz's policy that facilitation payments should not be made by any of its employees or third parties on Kropz's behalf (other than in circumstances where there is a risk of danger and harm to an employee as a consequence of non-payment). Not only does Kropz consider the payment of facilitation payments to be contrary to its Code of Ethics, they are illegal and may result in severe criminal penalties for both the company and employee or third party.
- 4.4 Kropz will provide specific training to employees operating in countries in which facilitation payments are known to be an accepted part of business.
- 4.5 If any employee is asked to make any payment which may be considered a facilitation payment they should:
- Refer to any guidance on facilitation payments in that country; and
  - Discuss the requested payment with their line manager and the Responsible Officer.

## 5. GIFTS AND HOSPITALITY

- 5.1 Kropz understands the competitive nature of business and it is not the desired aim of this policy to prevent employees from giving and receiving normal and reasonable gifts or hospitality, which Kropz supports as a legitimate way to create and maintain business relationships.
- 5.2 What will be considered normal and reasonable will depend on the facts, including the business activity and location. Specific training on how this will apply to each employee will be provided according to the areas in which they operate.
- 5.3 However, in order to protect Kropz and its employees, it is vital to ensure that the provision or receipt of such gifts and hospitality are not, and could not be, considered to be bribes (i.e. given for the purpose of improperly influencing the recipient's decision making in favour of the donor). Any gift or hospitality which is given or received by a



Kropz employee in the expectation of favourable treatment or consideration by the recipient/donor must be declined.

- 5.4 Gifts can be given or received if of nominal value and not in cash.
- 5.5 Any gifts which are received by a Kropz employee with a value of over US\$150 must be registered within 7 days with the Responsible Officer. No gift may be accepted with a value of over US\$250. Registration should include all details of the gift, the recipient and the donor, the relationship between them and the reason for the gift.
- 5.6 No gifts may be given by a Kropz' employee with a value in excess of US\$300 other than branded products made from the company's own production and which amount to the promotion of the product to the market. Any gift of any value to a government official must be pre-approved and fully documented in accordance with the policy at Appendix 2.
- 5.7 Any hospitality must be proportionate and reasonable in all the circumstances in accordance with local custom. Any expenditure over US\$200 per head (or local currency equivalent) cannot be given or received without the prior express approval of the Responsible Officer and must be reimbursed in accordance with the policy at Appendix 3. Hospitality includes business meals and any other form of recreation or entertainment. Hospitality must relate to Kropz' proper business purposes and a Kropz employee must be present on all occasions.
- 5.8 Sponsored travel for clients, potential clients and/or other third parties (including government officials) should always be proportionate and never excessively luxurious. All travel expenditure whether for employees or third parties should be pre-approved. Depending on the facts, the employee should consider before booking any travel for third parties:
- Who is travelling?
  - What is the purpose of the trip?
  - What class of travel would be appropriate?
  - Is an overnight stay required and, if so, what standard of hotel is appropriate? and

- Is there an alternative to the trip (e.g. videoconferencing or the Kropz’s employee travelling to the third party rather than *vice versa*).

Further details of Kropz’s policy in relation to gifts, hospitality and travel is set out at Appendix [2].

Example of acceptable Hospitality:

*Representatives from a long-standing client of Company X from India are travelling to the United Kingdom and ask if the people they deal with at Company X would like to meet up. As there is a cricket match between England and India while they are in the United Kingdom, the Company X contact organises a box at the ground with full hospitality and afterwards takes them out for dinner.*

Example of unacceptable or excessive Hospitality:

*In order to set up a new mine in a West African country, Company Y needs a licence from the government. After a meeting with the relevant government minister, representative of Company Y suggests that the minister fly out to visit one of the company’s sites in Mozambique. He offers the Minister first class flights for him and his family and pays for the minister and his family to stay in a nearby, luxury 5\* resort for two weeks.*

Example of an acceptable Gift:

*Company A invited potential investors to Madagascar to visit the mine in order to show the extent of the operation and explain how it would work. While there, the investors were all given a small piece of local craftsmanship, bought by Company A from a local artist for a nominal amount of money.*

Example of an unacceptable or excessive Gift:

*Company B hosts a small marketing event in India for some of its major clients, potential investors and government officials. At the event, each attendee is presented with a “goodie bag” containing, among other things, an expensive watch and jewellery that Company B has bought for the attendees.*

## 6. POLITICAL AND CHARITABLE DONATIONS

- 6.1 Kropz takes its corporate social responsibility very seriously. Kropz supports, and encourages its employees to engage in, charitable endeavours.
- 6.2 Similarly, Kropz understands the importance its employees in being involved actively in democratic political processes.

- 6.3 However, this does not extend to the making of political or charitable donations which must, in no circumstances, be made by any employee or third party on behalf of Kropz without the express prior written approval of the Responsible Officer. No charitable donation may be made at the request of a government official. Charitable donations will be assessed, prior to approval, in accordance with the policy at appendix 3.

Example of acceptable political activity:

*An employee's wife is standing as a parliamentary candidate in her local area. At the weekends, the employee joins her on rallies and helps her hand out leaflets.*

Example of unacceptable political activity:

*A Company Z representative meets with a government official of Zambia with whom they have dealt for many years to discuss renewing their licences to work in that country. During the conversation, the official mentions that there is an election coming up and, in order to stand again, he would need to raise a considerable sum to fund his campaign. The Company Z representative makes a donation to the fund on behalf of the company.*

Example of acceptable charitable activity:

*A Company X employee in the UK is running the London Marathon for charity and sends an email to his colleagues asking for sponsorship. A lot of them donate money to his chosen cause, and his manager also makes a donation on behalf of the company.*

Example of unacceptable charitable activity:

*Stories have emerged in the international press suggesting, falsely, that Company Y has been mistreating its employees in some of its mines and not paying enough attention to their health and safety. This campaign appears to be driven by a human rights charity in the UK. A PR spokesman from Company Y contacts the charity to deny the allegations and, at the same time, offers to make a large donation to the charity on behalf of the company in return for them ending the campaign.*

## 7. BOOKKEEPING AND AUDITING

- 7.1 It is imperative that all employees keep accurate, thorough, detailed and up-to-date records of all expenses incurred and payments made to third parties, including hospitality and gifts, which sets out the parties and amounts involved, and the reason for the payments.

- 7.2 These records must be clear and accessible, fully documented where appropriate and be available for inspection at any time. Kropz expects all of its employees to comply with existing internal audit and accounting rules.
- 7.3 All of Gemfield's books and accounts must accord with appropriate accounting standards. "Off the book" payments or receipts of any kind are strictly forbidden. On no account may any transactions, receipts or assets be mis-described or entered in such a way as to be misleading. False accounting is, by itself, a separate criminal offence.

## 8. REPORTING AND WHISTLEBLOWING

- 8.1 In order for this policy to work, Kropz requires the co-operation of all of its employees. Any employee who witnesses bribery or corruption or questionable accounting or record-keeping should report it immediately to the Responsible Officer. This includes being offered a bribe by third parties as well as witnessing any other forms of corruption. Contact details of the Responsible Officer are at Appendix 4.
- 8.2 Kropz believes that a vital part of maintaining its zero-tolerance policy is for its employees to feel comfortable and supported in reporting any such acts. As such, within the constraints of the law and the need to investigate matters, Kropz will keep the report strictly confidential and do what it can to ensure that the person reporting the acts does not suffer any sort of repercussions from doing so (even if the allegations or suspicions ultimately prove to be unfounded). The perpetrators of any repercussions arising from an employee making a report will be dealt with the maximum possible severity.

## 9. ENFORCEMENT AND SANCTIONS

- 9.1 In many cases, employees involved in acts of bribery and corruption will be subject to criminal penalties.
- 9.2 Even if not illegal, or investigated by a law enforcement authority or regulator, if the acts are contrary to the guidance contained in this policy and/or are not in accordance with Kropz's Code of Ethics, Kropz reserves the right to take internal disciplinary action, including without limitation, dismissing those involved. Non-compliance with this policy will be considered a serious disciplinary offence.

10. ONGOING COMMITMENTS TO A ZERO-TOLERANCE  
STANCE ON BRIBERY AND CORRUPTION

- 10.1 This policy will be continuously monitored and regularly reviewed to ensure that it is fit for purpose and covers any changes to national and international laws and regulations.
- 10.2 Relevant training on the implementation of the policy will be regularly provided to all employees to ensure that they understand their responsibilities in implementing the policy.

## Appendix 1

### *Due diligence on third parties providing services to Kropz*

- Kropz requires its employees and management to complete the attached due diligence questionnaire on third parties whom it is intended will provide services to Kropz in any capacity whether or not those third parties have previously provided services to the company. In some cases, it will be necessary to seek information from the third party.
- The third party must provide the information required (if so requested) and all completed questionnaires and supporting documentation must be provided to the Responsible Officer before any contractual obligation is assumed by Kropz or payment made to the third party.
- It is the responsibility of the employee and the Responsible Officer to review the information provided and be satisfied that the information does not raise any “red flags” or concerns which mean that further questions need to be raised with the third party, additional enquiries made or the third party rejected as a service provider.
- No contractual obligation may be entered into by any employee without the written approval of the Responsible Officer. Red flags may be evidenced by the following (non-exhaustive) list:
  - The third party is based “offshore” in a high risk jurisdiction but performing services in-country.
  - The third party requires payment in cash rather than by bank transfer.
  - The third party does not have a bank account or requires payment through another party’s bank account.
  - There is a lack of transparency about the ownership of the third party or a government official is a stakeholder.
  - The third party refuses to sign a contract with Kropz which provides that it will not offer or pay bribes, nor receive or solicit bribes.
  - The scope of the third party’s services is unclear or contains vague formulations.
  - The third party seeks unrealistic levels of remuneration.
  - There is evidence of allegations of corruption or other illicit practices against the third party or its principles, owners or management.

- The Responsible Officer will be responsible for maintaining copies of all of the completed due diligence questionnaires.

## Appendix 2

### *Procedures relating to gifts, hospitality and travel*

#### Gifts

- No gift may be given for the purpose of inducing or rewarding improper performance of any person's duties or for the purpose of influencing a foreign public official in the performance of his duties or in the knowledge or belief that the recipient is not permitted to accept it.
- Any gift given to a Kropz employee with a value of over US\$150 (or local currency equivalent) must be registered in writing by the employee with the Responsible Officer within 7 days of receipt of the gift and the registration must identify the provider of the gift, the nature of the gift; the estimated value and the registrant must certify that, to his knowledge, the registrant was not given the gift in expectation of any improper conduct.
- No gift may be accepted by a Kropz' employee with a value of over \$250 and cash gifts may not be accepted in any circumstances.
- No Kropz employee may give a gift with a value of over US\$300 without prior written approval from the Responsible Officer following the provision of information about the recipient of the gift and the circumstances in which it will be given.
- Any gift to a government official of any value must be pre-approved by the Responsible Officer and fully documented, reflecting the purpose and the recipient.

#### Hospitality

- No hospitality may be given for the purpose of inducing or rewarding improper performance of any person's duties or for the purpose of influencing a foreign public official if the performance of his duties or in the knowledge or belief that the recipient is not permitted to accept it.
- It is recognised that the actual value of hospitality will vary from location to location, notwithstanding that the same price is paid. Accordingly the hospitality limits prescribed by Kropz will vary according to the relevant country as set out below ("the Prescribed Value").



	Prescribed Value
Congo Ghana	US\$180
South Africa	US\$200
UK	US\$250

- No Kropz employee may give or accept hospitality with a value in excess of the Prescribed Value per head without express prior approval of the Responsible Officer. Hospitality below that value can be given or accepted provided that there is no suggestion that, in being offered the hospitality, it could or would be construed as being improper and it is reasonable and proportionate by reference to local custom.
- Reimbursement of any hospitality expenses incurred by Kropz employees (whether less than the Prescribed Value per head or over the Prescribed Value per head (with prior approval)) must be sent to the Responsible Officer and accompanied by a prescribed form setting out (i) the nature and purpose of the hospitality; (ii) the persons in attendance; (iii) dated receipts for each expense claimed; and (iv) a counter-signature by a line manager. No expenses will be reimbursed in advance of such information being provided. Under no circumstances can hospitality be paid for in cash unless absolutely necessary and there will be no reimbursement of any expenses without supporting documentation. All expenses must be reimbursed by the Responsible Officer and must not be reimbursed out of any monies held locally.
- Kropz issues corporate client cards to a number of its officers for use where practical. It is the company's policy that the corporate credit card must be used for all expenditure where practical.

#### Travel

- Any air travel taken by a Kropz employee for work related purposes must be booked through an *appointed agent* and will only be reimbursed in accordance with the company's existing policies. If total expenditure is above US\$2,000, then the expenditure must be pre-approved by the Responsible Officer.

- Any travel and hotel arrangements booked on behalf of any third parties (including government officials) must be (i) pre-approved by the Responsible Officer in writing, the applicant (“the Sponsoring Employee” having set out the person(s) for whom travel is being booked, the purpose behind the travel arrangements, the estimated budget for the travel and the nature of the travel/hospitality arrangements; (ii) (save in respect of employees based in England) paid for by the company directly and not paid for by any employee or the third party (and no reimbursement will be permitted); (iii) must be entirely for a stated business purpose (and relate only to that purpose); and (iv) any business hospitality in connection with the travel must be limited, proportionate and modest, in accordance with local custom. (For employees based in England, those employees may pay for travel expenses directly and seek reimbursement.)
- The Sponsoring Employee is responsible for submitting all receipts and documentation after the completion of the travel to support the expenditure incurred.
- In no circumstances will Kropz pay for travel, hospitality or gifts for family members or friends of employees or customers, potential customers or foreign public officials.

## **Appendix 3**

### *Charitable Giving*

- Any charitable donation by the company must be pre-approved in writing by the Responsible Officer.
- Prior to any approval being given, a written record must be made of the following information and an assessment made by the Responsible Officer as to whether the proposal poses any red flags or other risks:
  - The amount of the donation and the recipient party.
  - The purpose of the donation and whether it is in the company's interest to make such a donation.
  - The bank account details to where the donation is to be sent.
  - Due diligence which has been carried out on the recipient and the identity of the trustees of the charity.
  - Whether there is any information from searches undertaken by the company in connection with the recipient whether it has any connection with government officials or government agencies.

## Appendix 4

Contact details for the Responsible Officer:

South Africa:-

Mr Martin Carstens

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