

Whistleblower Policy

1. Policy Overview

Alkane Resources Limited and its subsidiaries (together **Alkane** or the **Company**) is committed to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. Alkane's Code of Conduct requires Alkane's officers, employees, contractors and service providers to observe high standards of business and personal ethics while carrying out their duties and responsibilities. These persons must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This policy sets out a framework for receiving, assessing, investigating, reporting and remediating whistleblower disclosures, and for protecting eligible whistleblowers from detriment and ensuring confidentiality. It applies to all Alkane officers, employees and contractors and any other person who is classified as an Eligible Whistleblower.

The purpose of this policy is to:

- (a) encourage genuine concerns about possible wrongdoing or inappropriate behaviour to be raised as soon as possible;
- (b) provide guidance in relation to how individuals can raise those concerns and how they will be investigated;
- (c) ensure that individuals can make disclosures safely, securely and with confidence that they will be protected and supported; and
- (d) comply with legislative requirements.

Alkane encourages all employees who have concerns about possible wrongdoing or inappropriate behaviour within the Company to raise those concerns in the ordinary course of business. If you do not feel comfortable speaking up in the ordinary course of business, would like to raise your concerns anonymously, or feel that you need confidentiality and protection then Alkane encourages you to raise your concerns in accordance with this policy.

Nothing in this policy limits or removes any protections available under law. If there is any inconsistency between this policy and applicable legislation, the legislation will prevail.

2. Scope – Who and What is Covered?

You will be protected under this policy and the whistleblower protection laws if:

- (a) you are an Eligible Whistleblower;
- (b) you report your concerns to an Eligible Recipient, ASIC, APRA or a prescribed Commonwealth authority; and
- (c) the information you report concerns, or you reasonably suspect it concerns, a Disclosable Matter.

If your report meets all of the above criteria, it will be a **Protected Report**. If your report doesn't meet the above criteria, Alkane still encourages you to raise your concerns. However, only Protected Reports receive the legal protections outlined in this policy.

The Tax Administration Act also provides protection in respect of certain matters that relate to Alkane's tax affairs. For further information about the protections under the tax whistleblower regime, see the webpage of the ATO on tax whistleblowers (available [here](#)).

2.1 Who is an Eligible Whistleblower?

You are **Eligible Whistleblower** if you are, or have been:

- (a) an officer, employee or associate of Alkane;
- (b) a person who supplies, or an employee of a person who supplies, goods or services to Alkane; or

- (c) a spouse, relative or dependent of any of the above persons.

2.2 Who is an Eligible Recipient?

Each of the following persons is an **Eligible Recipient**:

- (a) Alkane's independent whistleblower service, Alkane Speak-up Service;
- (b) the Whistleblower Officer;
- (c) an officer or senior manager of Alkane, including Alkane's directors and Company Secretary;
- (d) an auditor, or a member of an audit team, conducting an audit of Alkane;
- (e) an actuary of the Company; or
- (f) a lawyer, for the purpose of obtaining legal advice or legal representation about whistleblower protections.

2.3 What is a Disclosable Matter?

Information will be a **Disclosable Matter** if you have reasonable grounds to suspect that the information:

- (a) concerns misconduct or an improper state of affairs or circumstances in relation to Alkane;
- (b) indicates that Alkane or one of its officers or employees has engaged in conduct that constitutes an offence against the Corporations Act, the Australian Securities & Investments Commission Act 2001 (Cth) or any instrument made under those Acts, or other financial services legislation specified in under section 1317AA(5) of the Corporations Act;
- (c) concerns an offence against other Commonwealth legislation that is punishable by imprisonment for 12 months or more;
- (d) represents a danger to the public or the financial system; or
- (e) is prescribed by the Australian whistleblower regulations as a 'Disclosable Matter'.

A Disclosable Matter does not need to involve a contravention of the law. It could be a systemic issue of concern that a relevant regulator should know about so they can properly perform their functions, or it may relate to dishonest or unethical behaviour.

Examples of the types of matters that may be Disclosable Matters include, but are not limited to:

- (a) conduct or practices that are illegal or breach any law or regulation;
- (b) fraudulent or corrupt practices (including offering or accepting bribes);
- (c) unsafe work practices;
- (d) concerns or complaints regarding corporate accounting practices, internal controls or auditing;
- (e) misconduct in relation to Alkane's tax affairs
- (f) serious inappropriate or unethical conduct such as gross mismanagement or serious and substantial waste of company resources procedures; or
- (g) taking or threatening to take detrimental action against a person who has made, is suspected to have made, or is planning to make, a disclosure under this policy.

2.4 Reasonable Grounds

You must have reasonable grounds to suspect that the information you are disclosing is true. A mere allegation with no supporting information is not likely to be considered as having reasonable grounds to suspect. However, you are not required to prove your allegations and you can still qualify for protection if the matter that is disclosed (on a reasonable basis) turns out to be incorrect.

Individuals who deliberately submit false reports will not be able to access the protections under the whistleblower protection laws and unsubstantiated allegations that are found to have been made maliciously or knowingly false will be viewed seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship. There may also be legal consequences if you make a knowingly false report.

3. Exceptions

Personal work-related grievances are generally not considered Disclosable Matters, and a disclosure will not qualify for protection to the extent that it relates solely to a personal work-related grievance. Personal work-related grievances typically relate to an individual's current or former employment arrangements, performance, remuneration outcomes or personal circumstances that do not have significant implications for the Company.

Examples of personal work-related grievances include:

- (a) an interpersonal conflict between the discloser and another employee of Alkane;
- (b) a decision relating to the discloser's employment, transfer or promotion; or
- (c) a decision to suspend or terminate the employment of the discloser, or otherwise to discipline the discloser.

In the first instance, personal work-related grievances should be raised with your supervisor. If your operation at site level has a routine for addressing these kind of personal work-related grievances, then that process should be followed.

A mixed report (i.e. a report about a Disclosable Matter which is accompanied by a personal work-related grievance) may still qualify for protection under the whistleblower protection laws.

If you are uncertain of whether a matter is a Disclosable Matter, you should seek advice from the Whistleblower Officer or another Eligible Recipient. You may also wish to seek advice from an independent legal adviser.

4. Whistleblower Protections

If you make a Protected Report, you are entitled to the benefit of certain protections in accordance with whistleblower protection laws.

4.1 Confidentiality

Strict confidentiality obligations apply in respect of Protected Reports. If you make a Protected Report, it is illegal for a person to disclose your identity or information that is likely to lead to identification of your identity, unless:

- (a) you give your consent;
- (b) the disclosure is required by law; or
- (c) the disclosure is made to:
 - (i) a professional legal advisor for the purpose of obtaining legal advice or representation; or
 - (ii) authorised regulatory bodies.
- (d) information likely to lead to your identification (but not your identity) is disclosed for the purpose of investigating the matter, with all reasonable steps taken to reduce the risk of identification.

You may be asked to provide consent to the disclosure of your identity or information that is likely to lead to your identification to facilitate an investigation and/or resolution of the matter you disclose. Alkane encourages you to provide such consent because if consent is withheld, it may not be possible to adequately investigate and respond (if at all) to your disclosure.

Any breach of whistleblower confidentiality will be treated as a serious matter and may be the subject of disciplinary action up to and including dismissal or termination of services. Breaches of whistleblower confidentiality are also an offence under the whistleblower protection laws and serious penalties apply for both individuals and corporations.

If you believe that your confidentiality has been breached in connection with a disclosure you have made, you are encouraged to seek independent legal advice regarding your rights. You may lodge a complaint to a regulatory body, such as ASIC APRA or the ATO, if you believe that your confidentiality has been breached. You can also report your concerns to the Whistleblower Officer or by contacting the Alkane Speak-up Service. All complaints about potential breaches of confidentiality will be treated seriously, investigated promptly, and managed with strict confidentiality in accordance with this policy and applicable laws.

Everyone involved in an investigation must take all reasonable steps to reduce the risk that a discloser will be identified.

Alkane will do this by:

- (a) obscuring your name and identifying features from any internal reporting about your disclosure (unless you agree for your identity to be known);
- (b) referring to you in a gender-neutral context (unless you agree for your identity to be known);
- (c) where possible, contacting you to help identify certain aspects of your disclosure that could inadvertently identify you;
- (d) engaging qualified staff to handle and investigate disclosures;
- (e) storing all material relating to disclosures securely;
- (f) limiting access to all information to those directly involved in handling and investigating the disclosure; and
- (g) ensuring that anyone who is involved in handling and investigating your disclosure is aware of the confidentiality requirements.

4.2 Protection from Detriment

It is illegal for someone to cause, or threaten to cause, detriment to you because you have made, may have made, propose to make, or could make a Protected Report and serious penalties apply for both individuals and corporations.

If you are subject to such detriment, you may also seek compensation or other remedies if you have suffered loss, damage or injury because of a Protected Report or because Alkane failed to take reasonable precautions and exercise due diligence to prevent the detriment.

Detriment includes dismissal, suspension, demotion, or termination of your employment or engagement with Alkane, changes to your employment, position, or duties to your disadvantage; discrimination; harassment or intimidation; harm or injury (including psychological harm); damage to property, reputation, business or financial position; or any other damage.

Detrimental conduct does not include administrative action that is reasonable for the purposes of protecting you from detriment (e.g. moving you to another area of the office to prevent victimisation or managing unsatisfactory work performance in line with Alkane's usual policies and procedures).

If you believe you have suffered detriment as a result of making a report, you are encouraged to obtain independent legal advice in relation to your rights. You can also report your concerns to the Whistleblower Officer or by contacting the Alkane Speak-up Service. All complaints will be handled with strict confidentiality and in accordance with the protections outlined in this policy.

4.3 Immunity from Liability

You may also be entitled to other legal protections in relation to your disclosure, including:

- (a) protection from civil, criminal, or administrative legal action for making a Protected Report;
- (b) protection from contractual or other remedies being sought against you based on the Protected Report
- (c) the information you provide may not be admissible in evidence against you in legal proceedings, except for proceedings in respect of the falsity of the information.

However, the protections do not grant you immunity for any misconduct that you have engaged in that is revealed in your disclosure (or revealed by an investigation following your disclosure).

5. Making a Report

Alkane encourages you to raise any concerns about possible wrongdoing or inappropriate behaviour as soon as possible. You may report your concerns directly to the Whistleblower Officer, another officer (which includes a director or company secretary), or a senior manager of Alkane. While we encourage internal reporting, you are not required to do so before seeking external resolution.

You can make a disclosure at any time, including outside business hours. Reports may be made confidentially and/or anonymously.

To help us respond effectively, we encourage you to submit your concerns in by phone, or in writing via the website or by mail. Anonymous reports can be submitted through our independent whistleblower service or by mail. Contact details for the Whistleblower Officer, other Eligible Recipients, and our independent whistleblower service are available on Alkane's internal electronic system and company website.

If you are unsure about how to make a report or wish to discuss your options, you may contact the Whistleblower Officer or our independent service for guidance.

You may also report Disclosable Matters to certain external persons or entities, including, but not limited to, the Alkane Speak-up Service, Alkane's auditors, ASIC, APRA, the ATO or any authorised Australian Commonwealth authority.

Nothing in this policy should be interpreted as restricting you from raising issues or providing information to an external party.

Alkane has engaged Deloitte as its independent whistleblower service. Reports can be made 24/7 via phone 1800 878 950 (Australia) or +46 20 012 34 75 (Sweden), online via the website [Alkane Speak-up Service](#), or post to Alkane Resources, Reply Paid 12628, A'Beckett Street, Melbourne VIC 8006. Reports can be made anonymously.

There are additional categories of disclosures called 'public interest disclosures' and 'emergency disclosures' that can be made to external bodies, journalists and members of Parliament but only in certain limited circumstances, as set out in the Corporations Act.

While this policy principally deals with internal disclosures, the protections afforded by the Australian whistleblower laws also include some types of disclosure made to external parties, such as:

- (a) legal representatives, to obtain advice or representation about the Australian whistleblower laws;
- (b) ASIC, APRA or the ATO; or
- (c) MPs or journalists, where you have reasonable grounds to believe that making the further disclosure would be in the public interest or the information concerns a substantial and imminent danger to health or safety to one or more persons or to the natural environment, but only if:
 - (i) you previously made a disclosure of that information to either ASIC, APRA or another Commonwealth body prescribed by regulation; and
 - (ii) you notified that body in writing of your intention to disclose to an MP or journalist (where, for public interest disclosures, at least 90 days must first have passed since your previous disclosure before this notice may be given).

It is important you understand strict criteria apply and you should obtain independent legal advice before making a disclosure to an MP or journalist.

For more information about the Australian whistleblower laws (including how to make a disclosure directly to ASIC or the ATO), see the information available on the ASIC website (including Information Sheet 239 *How ASIC handles whistleblower reports* and Information Sheet 247 *Company officer obligations under the whistleblower protection provisions*) and the ATO website.

6. Handling Protected Reports

After receiving a disclosure under this policy, Alkane will assess the information provided to determine whether it is a Protected Report, how it will be handled and whether an investigation is required. Any person who receives a Protected Report made under this policy must ensure that the report is managed in compliance with this policy and any relevant procedures.

The process for handling a Protected Report may include:

- (a) assessing the disclosure and deciding on the need for (and scope of) an investigation;
- (b) appointing an investigator (and determining whether that is an internal or external investigator);
- (c) circulating updates on the progress and completion of investigations to the whistleblower, where appropriate and possible.

The investigator may need to contact the whistleblower for further information. Updates on the progress and outcome of the investigation will be provided where practicable, subject to confidentiality and privacy considerations. If you have made your disclosure anonymously, we suggest you maintain ongoing two-way communication with us, so we may ask follow-up questions or provide feedback. If you can be contacted

(including through anonymous channels), we will provide appropriate status updates, with frequency and timing depending on the nature of your disclosure. There may be circumstances where it may not be appropriate to provide details of the outcome to the whistleblower.

Alkane is committed to fair treatment of all individuals named in whistleblower disclosures. Those subject to investigation will be informed of the allegations, given an opportunity to respond, and provided access to support services.

The method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure but may include a summary report of the findings. Any reporting of findings will have regard to applicable confidentiality requirements.

7. Support and practical protections

Alkane has in place processes for protecting, supporting and monitoring the welfare of anyone who makes a disclosure. This includes a designated Whistleblower Officer, who is available to provide mentoring and other support to the whistleblower if required. This also includes risk assessment of any potential detriment, work adjustment considerations and support services such as stress management strategies which may include counselling

8. Reporting to the Board

The Whistleblower Officer will, while maintaining confidentiality, provide the Board and/or the Audit & Risk Committee at least quarterly with details of whistleblowing reports, which may include information on the number and nature of disclosures made in the last quarter (for example, by who, who to and matter type); how disclosures were made; the status of any investigations underway; any actions taken in relation to a disclosure; the frequency of communications with disclosers; the outcomes of completed investigations; and the timeframes for responding to and investigating disclosures.

The Board or its delegated committee will also be informed of any material incidents reported under this policy, including any information that may be materially price sensitive in accordance with Alkane's continuous disclosure policy.

9. Training

Alkane's Whistleblower Officer and all Eligible Recipients of disclosures must attend compulsory training organised by Alkane on its processes and procedures for receiving and handling disclosures made under this policy, including training on confidentiality and the prohibitions against detrimental conduct.

Alkane will also inform its external Eligible Recipients (for example, Alkane's auditor and tax agent) about their obligations under the Australian whistleblower laws.

Alkane's employees must attend compulsory training on Alkane's whistleblower program which will include information on how to make a disclosure, what the disclosure may be about, to whom a disclosure may be made, the protections and support available and when further information or independent legal advice might be sought.

10. Access, Review and Breaches of Policy

This policy will be available on our website at <https://alkres.com/about/governance/> to ensure it is accessible for all Eligible Whistleblowers.

This policy may be reviewed and amended from time to time and will be periodically reviewed by the Board to check that it is operating effectively and determine whether any changes are required to the policy.

It is the responsibility of all Alkane officers and employees to comply with, be aware of, and understand the scope of, the whistleblower protection laws and the protections that they afford whistleblowers. Any breach of this policy may result in disciplinary action, up to and including termination of employment.

This policy does not form part of any employment contract and does not impose contractual obligations on Alkane.

11. Defined Terms

APRA means the Australian Prudential Regulation Authority.

ASIC means the Australian Securities and Investments Commission.

ATO means Australian Taxation Office.

Corporations Act means the Corporations Act 2001 (Cth).

Disclosable Matter has the meaning given in section 2.3.

Eligible Recipient has the meaning given in section 2.2.

Eligible Whistleblower has the meaning given in section 2.1.

Protected Report has the meaning given in section 2.

Tax Administration Act means the Taxation Administration Act 1953 (Cth).

Whistleblower Officer means the General Counsel.