



# Whistleblowers Policy

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# **Whistleblowers Policy**

Metal Tiger plc ABRN 641 646 924 and its subsidiaries (the Company)

## **1. Introduction and Purpose**

### **1.1. Background**

The Company is committed to promoting and supporting a culture of corporate compliance and ethical behaviour.

### **1.2. Purpose**

The purpose of this Whistleblower Policy (**Policy**) is to:

- a) encourage Whistleblowers to raise any concerns and report instances of Reportable Conduct where there are reasonable grounds to support such action, without fear of intimidation, disadvantage or reprisal;
- b) outline the procedures for identifying and reporting genuine concerns about Protected Matters under this Policy;
- c) promote awareness of, and outline, the protections for genuine Whistleblowers; and
- d) outline the additional procedures and protections that apply to Whistleblowers under the PIDA or the Corporations Act.

### **1.3. Definitions**

Capitalised terms used in this Policy are defined in the Schedule.

## **2. Scope**

The following persons can make a disclosure that qualifies for protection under this Policy:

- a) all Employees and officers (current and former);
- b) contractors or suppliers of goods or services to the Company, including their employees (current and former); and
- c) relatives (such as a parent, child or sibling), dependants or spouses (including a de factor partner) of an individual referred to in this clause 2.

## **3. Reportable Conduct**

### **3.1. Definition of Reportable Conduct**

Subject to section 3.2, Reportable Conduct is any actual or suspected conduct on the part of the Company, its related bodies corporate, employees or officers of the Company or its related bodies corporate, which:

- a) constitutes a criminal offence under applicable laws and regulations or under the rules or other requirements of any relevant stock exchange;
- b) constitutes a failure to comply with applicable laws and regulations, the rules or other requirements of any relevant stock exchange, certain legal obligations or obligations following adopted rules, codes and standards;
- c) is unethical, improper or otherwise a breach of the Company's Code of Conduct or any of the Company's other policies and procedures;
- d) amounts to dishonest, fraudulent or corrupt activity, including bribery, extortion, money laundering, acts of corruption or any other activity in breach of the Company's Anti-Bribery and Corruption Policy;
- e) endangers the health or safety of individuals or is potentially harmful or damaging to the Company and/or its employees and contractors, including unsafe work practices, environmental damage, adverse conduct towards community members and/or stakeholders or abuse of property and resources;
- f) amounts to an abuse of authority;
- g) may cause material financial loss to the Company;
- h) involves victimisation in any circumstances;
- i) amounts to a miscarriage of justice;
- j) amounts to any other misconduct or improper state of affairs or circumstances in relation to the Company.

### 3.2. **What is not Reportable Conduct**

To be afforded protection under this Policy, PIDA and the Corporations Act, the conduct disclosed must amount to Reportable Conduct.

Personal work-related grievances are not Reportable Conduct and should not be reported under this Policy.

Personal work-related grievances are grievances which relate to a person's current or former employment and only have implications for them personally. Examples include:

- a) interpersonal conflicts between the Discloser and other employees;
- b) decisions regarding engaging, transferring or promoting a Discloser; and
- c) decisions to discipline a Discloser or suspend or terminate the engagement of a Discloser.

A disclosure about a personal work-related grievance may still qualify for protection and should be raised under this Policy if:

- e) it includes information about Disclosable Conduct;
- f) the disclosure has significant implications for the Company or suggests misconduct beyond a Discloser's personal circumstances;
- g) the disclosure suggests the entity has breached the employment or other laws punishable by imprisonment for a period of 12 months or more; or
- h) the Discloser suffers from or is threatened with detriment for making a disclosure.

### **3.3. Protected Disclosure**

Any report made through the channels outlined in this Policy (including to the Protected Disclosure Officer) by a Whistleblower who has reasonable grounds to suspect that the information disclosed indicates Reportable Conduct is a Protected Disclosure.

A Whistleblower does not need to be sure that the information disclosed in a disclosure is true, however they must have reasonable grounds to suspect that the information disclosed indicates Reportable Conduct. A Whistleblower can still qualify for protection even if it turns out to be incorrect.

A Whistleblower will not be penalised if their disclosure turns out to be incorrect, however, a Whistleblower must not make a report that they know to be false. Where a person makes a false report, this will be considered a serious matter and may result in disciplinary action.

If a Whistleblower would like further information before making a report, they should contact one of the Company's Protected Disclosure Officers (see section 4.2)

## **4. How to make a report**

For a Whistleblower to qualify for protection under this Policy, Whistleblowers must report Reportable Conduct to one of the Company's Eligible Recipients, being:

- a) an officer or senior manager of the Company or a related body corporate;
- b) an internal or external auditor or actuary of the Company or related body corporate; or
- c) one of the Company's Protected Disclosure Officers.

### **4.1. Supervisors and Managers**

For most issues, staff may be comfortable discussing any concerns they have informally with their immediate supervisor, manager, or another senior manager within their department and The Company encourages staff to continue to feel empowered to raise issues in this way. The Company is committed to the creation of a supportive workplace environment and seeks to create a culture where concerns can be discussed openly and transparently.

However, where a staff member has concerns about Reportable Conduct and is not comfortable raising these concerns informally in the ordinary course, or would prefer to make a formal report under this Policy in relation to their concerns, they are encouraged to report their concerns under this Policy.

Please note that in order for a Whistleblower to receive the protections outlined in this Policy, including those that apply under law, they will need to make a report through the formal channels outlined in this Policy

#### 4.2. **Protected Disclosure Officers**

Any person may make a report of Reportable Conduct to any of the Protected Disclosure Officers listed below.

The Company's Protected Disclosure Officers are:

David Michael McNeilly	Adrian Bock
<p style="text-align: center;">Metal Tiger plc Weston Farm House Weston Down Lane Weston Colley Winchester Hants SO21 3AG United Kingdom</p> <p>Office number: +44 20 3287 5349</p> <p>Email address: michaelmcneilly@metaltigerplc.com</p>	<p style="text-align: center;">Metal Tiger plc Weston Farm House Weston Down Lane Weston Colley Winchester Hants SO21 3AG United Kingdom</p> <p>Office number: +44 20 3287 5349</p> <p>Email address: adrianbock@MetalTigerplc.com</p>

Upon receipt of a Protected Disclosure, a Protected Disclosure Officer will provide the details of the disclosure to Charles Hall, Chairman for investigation in accordance with this Policy, including applicable confidentiality requirements.

#### 4.3. **Reporting anonymously**

A report of Reportable Conduct may be submitted anonymously if a Whistleblower does not wish to disclose his/her identity to a Protected Disclosure Officer. This will not affect the protections afforded to the Whistleblower.

## **5. Protection available to Whistleblowers**

### **5.1. Protection from Retaliation, Victimization or Disadvantage**

No Whistleblower will be subjected to any Retaliation, Victimization or Disadvantage on account, or partly on account, of having made a Protected Disclosure.

The Company will not tolerate any acts of Retaliation, Victimization or Disadvantage against anyone who comes forward and reports Reportable Conduct in accordance with this Policy. Any acts of Retaliation, Victimization or Disadvantage are themselves acts of misconduct, which will be dealt with under the Company's disciplinary and grievances processes and could result in dismissal.

Any acts of bullying or intimidation with the intention of stopping a person from making a report in accordance with this Policy will also be considered as Retaliation, Victimization or Disadvantage for these purposes.

The Company is committed to ensuring the confidentiality of all matters raised under this Policy and the protection of Whistleblowers from Retaliation, Victimization or Disadvantage as a result of Protected Disclosures in accordance with this Policy. Some of the steps that may be taken by the Company to protect Whistleblowers from Retaliation, Victimization or Disadvantage may include:

- monitoring and managing the behaviour of other employees;
- implementing investigation processes where appropriate;
- taking disciplinary action where appropriate for conduct that amounts to Retaliation, Victimization or Disadvantage or breaches the confidentiality requirements under this policy; and/or
- providing support services.

The Company will at all times be able to raise and address with a Whistleblower matters that arise in the ordinary course of their employment or contractual relationship with the Company (for example, any separate performance or conduct concerns), or take appropriate action to protect a Whistleblower from detriment, and this will not amount to detriment.

### **5.2. Examples of detrimental conduct**

Detrimental conduct can take the form of:

- a) dismissing an employee;
- b) injuring an employee in his or her employment;
- c) altering an employee's position or duties to his or her disadvantage;
- d) discrimination between an employee and other employees of the Company;
- e) harassment or intimidation of a person;
- f) any form of disciplinary action;
- g) harm or injury to a person, including psychological harm;
- h) damage to a person's property or reputation;
- i) damage to a person's business or financial position; or
- j) threatening to carry out any of the above.

### 5.3. **Protection of the Whistleblower's identity and confidentiality**

The identity of the Whistleblower and the subject of the Protected Disclosure will be subject to the strictest confidentiality and, if applicable, anonymity.

Where a report of Reportable Conduct is made in accordance with this Policy, the relevant Protected Disclosure Officer will not disclose any details that would reveal the identity of the Whistleblower without first obtaining that individual's consent, unless otherwise permitted or required by any applicable laws and regulations, the rules or other requirements of any relevant stock exchange or obligations following adopted rules, codes and standards.

The Company will protect the confidentiality of a Whistleblower's identity by:

- maintaining secure record-keeping and information sharing processes;
- redacting personal and other information contained in a disclosure that may help to identify the identity of the Whistleblower; and
- ensuring that staff or external investigators handling and investigating the disclosures are qualified to do so.

The Company may disclose information that could identify a Whistleblower, if it is reasonably necessary to disclose this information for the purposes of an investigation, provided the Company does not disclose the Whistleblower's identity and all reasonable steps are taken by the Company to prevent someone from otherwise identifying the Whistleblower. The Company may also disclose information that could identify a Whistleblower for the purposes of obtaining legal advice in relation to the operation of whistleblowing laws.

The identity of a Whistleblower may be deduced without there having been a breach of confidentiality or the provisions of this Policy with respect of anonymity, particularly if the nature of the Protected Disclosure points to one person having made it or the Whistleblower has told other people about the matters the subject of their report.

A Whistleblower should raise any issue they experience as a result of making a report (including if they believe or suspect that there has been a breach of their confidentiality) directly with Adrian Bock, CFO & Company Secretary.

It is illegal for a person to identify an eligible Whistleblower or disclose information in a report about a "disclosable matter" or "qualifying disclosure" made by them that is likely to lead to their identification, other than as set out above. Reports can also be made anonymously and still be protected under the Corporations Act.

#### **5.4. Protection of files and records**

All documents, files and records created during any investigation (the Records) will be retained under strict security protocols, and, subject to applicable laws and regulations, the rules or other requirements of any relevant stock exchange or obligations following adopted rules, codes and standards, any unauthorised disclosure of the Records to any person without the Whistleblower's consent or as otherwise permitted by law will be a breach of this Policy.

Any breach of this Policy through the unauthorised disclosure of the Records will be regarded as a serious matter and will be dealt with in accordance with the Company's disciplinary procedures and processes and could result in dismissal.

#### **6. False Reporting**

A false or malicious report of Reportable Conduct (where the Whistleblower has no reasonable grounds to suspect the matters comprising their report), risks causing serious damage to the reputations of those persons named in the report and to the Company.

Any false or malicious reporting of Reportable Conduct will be treated as misconduct and will be dealt with in accordance with the Company's disciplinary procedures and processes and could result in dismissal.

In addition, under certain applicable laws and regulations or the rules or other requirements of any relevant stock exchange, it is an offence to provide false information intentionally, and where this results in harm, a conviction may result in a fine, imprisonment or both a fine and imprisonment.

#### **7. Investigation of Reportable Conduct**

Following receipt of a report, a determination will be made as to whether an investigation should be undertaken, having regard to whether the report concerns Reportable Conduct and whether an investigation is necessary or appropriate in the circumstances. It may not be possible to investigate a report if the Company are not able to contact a Whistleblower to obtain sufficient information.

It is a breach of this Policy and of the Company's Code of Conduct for:

- a) a **Protected Disclosure Officer** not to refer a report of **Reportable Conduct** Charles Hall, Chairman, subject to applicable confidentiality requirements;
- b) an employee to refuse to co-operate with the investigation of a report of **Reportable Conduct**;
- c) a Protected Disclosure Officer, or another person made aware of a report of **Reportable Conduct**, not keeping a report of **Reportable Conduct** or the content thereof confidential;
- d) a **Protected Disclosure Officer** or any other person made aware of a report of **Reportable Conduct**, who fails, refuses or neglects to protect the identity of a **Whistleblower**.

#### 7.1. **Responsibility**

The investigation of a report of Reportable Conduct will be managed by Charles Hall, Chairman in accordance with the Investigation Process in section 7.3.

#### 7.2. **Investigation Process**

In accordance with the Investigation Process, Charles Hall, Chairman will determine the appropriate process and resources required for any investigation to be undertaken, having regard to the nature of the Reportable Conduct, the level of staff implicated and all other relevant circumstances of the matter.

Based on the above assessment, Charles Hall, Chairman will either solely investigate the matter or may appoint person(s) (which may include external advisors) to assist in the investigation of the matters raised in a report.

All investigations will be conducted in a respectful, thorough, fair and objective manner. The investigator will be impartial to the Whistleblower, those persons identified in the report, and the relevant team or department.

The objective of an investigation will be to determine whether there is enough evidence to substantiate the matters reported. As part of this, the relevant investigator is responsible for inquiring into the reported allegations of Reportable Conduct (which may include gathering evidence and

conducting interviews of relevant people) and determining whether the allegations are substantiated, partly substantiated, not able to be substantiated, or unsubstantiated.

A Whistleblower can choose to remain anonymous during and after an investigation process, however anonymity may affect the Company's ability to thoroughly investigate a report. In practice, a person investigating a report may be able to do so more thoroughly where clear consent is provided to disclose the Whistleblower's identity and the subject matter of their report, during an investigation.

The timeframe of the investigation may vary depending on the nature of the report. The Company will endeavour to complete investigations within 90 days, however acknowledges that this time period may be exceeded depending on the circumstances of the matter. A Whistleblower and any other employees involved in an investigation may contact the Company's senior management during and after an investigation if they require additional support.

The Company may keep the Whistleblower informed of the findings of any investigation of their report, however it may not always be appropriate to provide details of the outcome of an investigation, having regard to considerations of privacy, confidentiality and the legal rights of others (including those against whom allegations are made).

Unless there are confidentiality or other reasons not to do so, employees to whom a report relates will be informed of the allegations at the appropriate time, and given an opportunity to respond to the allegations made against them, as and when required by the principles of procedural fairness.

Any report prepared in relation to an investigation remains confidential to the Company and may be provided to the relevant decision-maker, subject to applicable confidentiality requirements. It will not be provided to a Whistleblower or a person to whom a report relates.

Where the alleged Reportable Conduct concerns a senior member of management or indicates a serious or pervasive violation which puts the Company at risk (whether from a reputable or financial perspective), Charles Hall, Chairman will consult with the Board (as the case may be and except for whoever the relevant person is) before a decision is made on the most appropriate action.

Based on the outcome of the investigation, appropriate action will be taken which may include, where deemed necessary, a disciplinary process. If an investigation finds that criminal activity is likely to have occurred, the matter may also be reported to the police and/or other regulatory authorities.

### 7.3. **Feedback**

Where appropriate and subject to applicable laws and confidentiality requirements the Company will, as soon as reasonably possible, provide regular feedback to the Whistleblower on the progress and/or outcome of the investigation if they are able to be contacted (including through anonymous channels). The Company will also provide appropriate updates to persons allegedly involved in alleged Reportable Conduct. The frequency and timeframe of these updates will vary based upon the nature of the report.

On a quarterly basis, Charles Hall, Chairman will (during a closed session) report to the Audit and Risk Committee on any reports of Reportable Conduct and provide details on the status and outcomes of any investigations in this regard. This may include a summary of the number, nature and outcome of matters that have been raised under this Policy. The Board may also be provided with additional information about any material incidents raised. Information provided to the Board will be de-identified as required.

## **8. Access to this Policy**

This Policy will be made available to all the employees of the Company and its officers by the following means:

- on implementation, this Policy will be communicated to all employees and officers by way of email;
- this Policy will otherwise be disclosed to employees and officers on commencement of employment; and
- to ensure persons outside of the Company can access this Policy, the Policy will also be published on the Company's website at: <https://www.metaltigerplc.com/>.

## **9. Training**

In order to educate employees on their rights and obligations, the Company undertakes to:

- conduct whistleblowing training for existing employees and to include education on this Policy in the induction of new employees; and
- train Protected Disclosure Officers on the correct handling of reports of Reportable Conduct.

## **10. Other matters**

### **10.1. Amendment of policy**

This Policy can only be amended with the approval of the Board. The Company reserves the right to vary, replace or terminate this Policy from time to time and at any time at its discretion.

10.2. **Application of policy to Employment**

This Policy does not form part of any individual's contract of employment or engagement.

10.3. **Adoption of Policy and Board review**

This Policy was adopted by the Board on 18 December 2020, and takes effect from that date and replaces any previous policy in this regard.

The Board will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

## Schedule 1 Definitions

For the purposes of this Policy:

**ASIC** means the Australian Securities and Investments Commission.

**Corporations Act** means Corporations Act 2001 (Cth).

**Corporations Legislation** has the meaning given to that term in section 9 of the Corporations Act, and includes the Corporations Act and Australian Securities and Investments Commission Act 2001 (Cth).

**Eligible Recipient** means any of the persons listed in section 4.

**Employees** include any director, secretary, officer, employee, secondee or contractor of the Company.

**Protected Disclosure Officer** means any of the personnel referred to in section 4.3 of this Policy.

**PIDA** means the Public Interest Disclosure Act 1998 (UK).

**Retaliation, Victimisation or Disadvantage** means any form of occupational or other detrimental treatment, including threats, interference, reprisal, intimidation, harassment, discrimination, disciplinary action, bias, exclusion, dismissal, demotion, civil claims, threatened actions or being otherwise adversely affected in respect of employment, profession or office, including employment opportunities and work security

**Whistleblower** means any person who makes a report in accordance with this Policy regarding actual or suspected Reportable Conduct

## **Annexure A - Additional Australian Requirements**

### **How will I be protected if I raise a concern?**

As set out in this Policy, the Company is committed to protecting Disclosers who raise a concern about a Protected Matter.

In addition, the Corporations Act and the Taxation Administration Act 1953 (Cth) (**Tax Administration Act**) give protection to eligible Disclosers who make reports about disclosable matters under those Acts, when the conditions set out below are satisfied.

The purpose of this Annexure is to set out further information regarding the protections which apply under Australian law.

### **What conduct amounts to a breach of the Corporations Act or the Tax Administration Act?**

A "disclosable matter" under the Corporations Act will arise where an eligible Discloser makes a report in circumstances where they have reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs in relation to the Company's Australian operations, or the operations of its Australian incorporated entities, including, but not limited to, conduct that:

- constitutes an offence against a range of corporate and financial sector legislation specified under the Corporations Act;
- constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- represents a danger to the public or the financial system; or
- is otherwise prescribed by regulation.

In addition, a disclosure may also be protected as a "qualifying disclosure" under the Taxation Administration Act where a report relates to a breach of Australian tax law or tax-related misconduct.

A report about a "disclosable matter" or a "qualifying disclosure" by an eligible Discloser will be protected under the Corporations Act and the Taxation Administration Act if it is made to an Eligible Recipient, one of the Reportable Conduct Officers. These protections are also available in relation to disclosures made to another person specified under those Acts as set out further below.

If a person makes a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation, their disclosure will also be protected even if it does not relate to a "disclosable matter" or a "qualifying disclosure".

Conduct which does not amount to a "disclosable matter" under the Corporations Act or a "qualifying disclosure" under the Taxation Administration Act will not be protected under those Acts.

### **Who can make a report?**

The Discloser must be a current or former officer or employee of a the Company or related bodies corporate, a contractor or supplier to the Company, an employee of a contractor or supplier, an associate of the Company, or a relative, spouse or dependant of one of these people (or a dependant of their spouse) in order to qualify for the protections under the Corporations Act and/or the Taxation Administration Act.

### **What special protections are available to Disclosers?**

The key protections under this Policy and applicable Australian laws are as follows:

**Confidentiality:** Under the Corporations Act (and the Tax Administration Act, where relevant), where a report is made about a "disclosable matter" or a "qualifying disclosure" by an eligible Discloser to an Eligible Recipient, one of the Reportable Conduct Officers, or another person specified under those Acts (as set out below), that eligible Discloser's identity (and information which is likely to identify them) can only be disclosed without their consent, if the disclosure is to:

- ASIC or APRA;
- the AFP;
- the Australian Taxation Commission in respect of tax-related misconduct; or
- a legal practitioner for the purpose of obtaining legal advice or legal representation,

or if it is reasonably necessary to disclose information for the purposes of an investigation, provided their identity is not disclosed and all reasonable steps are taken by the Company to reduce the risk that they will be identified.

It is illegal for a person to identify an eligible Discloser or disclose information in a report about a "disclosable matter" or "qualifying disclosure" made by them that is likely to lead to their identification, other than as set out above. Reports can also be made anonymously and still be protected under the Corporations Act.

**Non-victimisation:** Under the Corporations Act or the Tax Administration Act (where a report relates to tax-related misconduct), a person cannot engage in conduct (or threaten to engage in conduct) that causes detriment to an eligible Discloser (or another person) if:

- that person believes or suspects that a Discloser (or another person) made, may have made, proposes to make, or could make a disclosure that qualifies for protection, and
- the belief or suspicion is the reason (or part of the reason) for the conduct.

Where these protections apply, an eligible Discloser is also protected from liability for making the report (either by way of civil, criminal or administrative legal proceedings, or contractual or other remedies being sought against them). Further, information they disclose in a report made to a regulator or Commonwealth authority cannot be used in legal proceedings against them (except for proceedings in relation to giving false information). However, they will not be granted immunity from the consequences of any misconduct they have engaged in that is revealed by their report (including, but not limited to, any disciplinary action).

### **Who can disclosures be made to under Corporations Act and the Tax Administration Act?**

Protections are available under the Corporations Act (and/or the Tax Administration Act, where relevant) where an eligible Discloser makes a disclosure that is a "disclosable matter" or a "qualifying disclosure" under the Corporations Act (or the Tax Administration Act, where relevant) to an Eligible Recipient, one of the Reportable Conduct Officers, or another "eligible recipient" under law, which includes:

- an officer or senior manager of the Company;
- an auditor, or a member of the audit team conducting an audit of the Company;
- an actuary of the Company;
- ASIC, APRA or, in the case of tax-related misconduct, the Australian Taxation Commissioner, or a registered tax agent or BAS agent who provides tax agent or BAS services to the Company; or
- a legal practitioner, for the purpose of obtaining legal advice or legal representation in relation to a report.

In limited circumstances, certain "public interest" or "emergency" disclosures made to journalists or a parliamentarian are also protected by law. It is important that a Discloser understands the criteria for making a "public interest" or "emergency disclosure" before doing so. For example, they must have previously made a disclosure to ASIC, APRA or another prescribed body before they can make a "public interest" or "emergency" disclosure and, in the case of a "public interest" disclosure, at least 90 days must have passed since the previous disclosure. Please contact the Reportable Conduct Officer for information in relation to this.

A report must be raised with one of the above people in order to qualify for protection under the Corporations Act (or the Tax Administration Act, where relevant). A Discloser is encouraged to raise a disclosure with an Eligible Recipient, one of the Reportable Conduct Officers in the first instance, so that the Company can be in a position to identify and address any wrongdoing as early as possible.

### **What should a Discloser do if a protection is breached?**

Where a Discloser believes a protection under law has been breached, they should raise this with the Reportable Conduct Officer.

If a person suffers detriment because another person believes or suspects that they or another person has, proposes to make, could make or may make a report that qualifies for protection under the Corporations Act, that person can also seek compensation and other remedies through the courts if they suffer loss, damage or injury because of the disclosure, including if the Company fail to take reasonable precautions and exercise due diligence to prevent the detrimental conduct. A Discloser should seek legal advice if they are considering seeking such remedies.

### **Is anything not protected?**

The protections under law (including the Corporations Act) generally do not apply to personal work-related grievances. These are usually reports which relate to a person's employment and solely concerns them personally, which may include a conflict between a person and another employee, or a decision relating to their employment or engagement, such as disciplinary action.

However, the protections under law can still apply in some circumstances, such as where a person's report:

- relates to a "disclosable matter" (see above), including a breach of employment or other laws punishable by more than 12 months' imprisonment;
- has significant implications for the Company;
- relates to any detriment caused or threatened to a person for raising a concern; or
- relates to misconduct beyond the person's personal circumstances.

Where in doubt, a report should be made to the Reportable Conduct Officer. They will make sure the report is dealt with under the right policy.