

## Whistleblower Policy

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### 1 Applicability

A reference to **Firefinch** in this policy is a reference to:

- (a) Firefinch Limited ABN 11 113 931 105 (**Company**) and each of its subsidiaries (together the **Group**); and
- (b) any joint ventures under a Group company's operational control.

This policy applies to all directors, officers, employees, consultants and contractors of the Group (**Personnel**). This policy also applies, as far as is reasonably achievable, to The Group's service providers, suppliers and third-party contractors (**Third Parties**). Any of these persons making a report under this policy are referred to as a **whistleblower**.

All Personnel and any Third Parties will be provided with access to a copy of this policy via the Company's [website](#). Training or awareness sessions on this policy will be held from time to time, as required.

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### 2 Purpose

As set out in the Company's Code of Conduct, directors, officers, employees, consultants and contractors of the Company are expected to not only act in compliance with legal obligations, but also act ethically and responsibly, which involves acting with honesty, integrity and in a manner that is consistent with the reasonable expectations of investors and the broader community.

The purpose of this policy is to encourage the persons to whom the policy applies to raise any concerns or report instances of any potential breach of law, any violations (or suspected violations) of the Company's Code of Conduct or any other legal or ethical concern without the fear of intimidation or reprisal.

Unethical, unlawful or undesirable conduct is referred to in this policy as **reportable conduct**, examples of which are set out in section 2.

The Board has appointed the Company Secretary as the Whistleblower Officer for the purposes of this policy.

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### **3 Reportable conduct**

The following conduct by a person or persons connected with the Group, which in the view of a whistleblower acting in good faith is:

- (a) a breach of the Company's Code of Conduct;
- (b) dishonest, fraudulent or corrupt;
- (c) illegal (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- (d) in breach of applicable laws;
- (e) unethical or in breach of the Group's policies and procedures (either representing a breach of the Company's Code of Conduct or generally);
- (f) conduct amounting to harassment, discrimination, victimisation or bullying;
- (g) other serious improper conduct; or
- (h) any conduct which may cause financial or non-financial loss to the Group or be otherwise detrimental to the interests of the Group.

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### **4 Whistleblower Officer**

The Board will appoint a suitable senior employee to the position of "Whistleblower Officer", whose role it will be investigate the substance of any complaint regarding reportable conduct, to determine whether there is evidence in support of the conduct raised or, alternatively, to refute the report made.

The Whistleblower Officer has direct, unfettered access to independent financial, legal and operational advice as required for the purposes of effectively carrying out the role. The Whistleblower Officer also has a direct line of reporting to the Chairman.

The current Whistleblower Officer is the Company Secretary.

If the matter concerns the Whistleblower Officer, or a whistleblower is not comfortable contacting the Whistleblower Officer, they should contact the Company's Chairman.

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### **5 Procedure for reporting**

#### **5.1 Reasonable basis**

A whistleblower must act in good faith and do their best to ensure that there is a reasonable basis for making a report of reportable conduct. However, it is not the whistleblower's responsibility to investigate or prove a case of reportable conduct.

It is a serious matter to make allegations that prove to be unsubstantiated, or are made maliciously or known to be false, and any person doing so may be subject to disciplinary action, including termination.

## **5.2 Internal discussions**

It is expected that a whistleblower will be able to resolve most concerns or queries relating to reportable conduct by discussing the matter with their direct supervisor or manager. However, if a whistleblower is not comfortable speaking to their supervisor or manager, or are not satisfied with their response to the whistleblower's report, a whistleblower is encouraged to speak with anyone in management who they are comfortable in approaching.

Supervisors, managers and members of senior management are required to make reports of reportable conduct to the Whistleblower Officer, who has specific and exclusive responsibility to investigate all reports of reportable conduct.

A whistleblower may also report directly to the Whistleblower Officer.

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## **6 Investigation procedure**

The Whistleblower Officer will investigate all matters reported under this policy as soon as possible after the matter has been reported. A Whistleblower Officer may appoint a person to assist in the investigation of a matter raised in a report. Where appropriate, the Company will provide feedback to the whistleblower regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the reportable conduct and the circumstances.

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## **7 Protection of whistleblowers**

The Company is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report in good faith are treated fairly and do not suffer any disadvantage.

### **7.1 No disadvantage**

A whistleblower who reports reportable conduct will not be personally disadvantaged by having made the report by dismissal, demotion, any form of harassment, discrimination or current or future bias.

Where reprisals are taken or are claimed to have been taken against a whistleblower, the whistleblower should report it immediately to the Whistleblower Officer. If the matter is not remedied, then it should be reported in accordance with section 5 of this policy.

### **7.2 Confidentiality and privacy**

Subject to compliance with legal requirements, upon receiving a report under this policy, the Company will not, nor will any supervisor, manager or Whistleblower Officer, disclose any particulars that would suggest or reveal a whistleblower's identity as a whistleblower, without first obtaining the whistleblower's consent. Any disclosure that a whistleblower consents to, will be disclosed on a strictly confidential basis.

The Company will also ensure that any records relating to a report of reportable conduct are stored securely and are able to be accessed only by authorised staff.

Unauthorised disclosure of:

- (a) the identity of a whistleblower; or
- (b) information from which the identity of the whistleblower could be inferred,

will be a breach of this policy and the offender(s) will be subject to disciplinary action, which may include termination.

Review

The Board will review this policy at least annually and update it as required.

Date adopted
Last amendment
Last review