

## Whistleblower Policy

### Purpose

Federation Mining (The “Company”) is committed to creating and maintaining a positive and collaborative work environment, free of unethical, unlawful, improper or undesirable conduct or practices.

This policy describes the ways in which Personnel can confidently report any Reportable Conduct or suspected Reportable Conduct without fear of intimidation, disadvantage or repercussion. This policy outlines the way in which the Company will respond to and investigate reportable and suspected Reportable Conduct.

### Definitions

In this Policy:

“Reportable Conduct” shall mean any conduct by any Personnel connected with Federation which is:

- unlawful or unsafe conduct, including not complying with legislation, regulation, codes, guidelines and other regulatory instruments;
- conduct that is in breach of the Company’s Code of Conduct or any other Company policy;
  - conduct that falls below established standards or practice;
  - unethical or improper conduct, including dishonesty, fraud, corruption or bribery;
  - conduct that is in breach of confidentiality obligations.

“Personnel” shall mean:

- all directors, senior executives, employees and officers of the Company;
- contractors (including sub-contractors) occupying permanent or part time fixed term contracts;
- consultants or suppliers of goods or services and their employees; or
- third parties including intermediaries and associates.

### Scope

All Personnel are required to operate and behave in accordance with the Company Code of Conduct and have a duty to report known or suspected Reportable Conduct using the Whistleblower Arrangements as described in this policy.

The Company has established a framework for reporting, investigating and protecting the confidentiality and privacy of a Whistleblower.

This allows for internal and external confidential reporting channels (email & phone) whereby individuals may raise concerns regarding:

- Bribery, corruption and fraud
- Dishonest or unlawful conduct or practises
- The Code of Conduct or company policies
- Conduct endangering life, the environment or the community which has been reported to management and not acted upon

### Oversight & Enforcement

The implementation, monitoring and review of this policy is the responsibility of the Vice President responsible for Human Resources and the Board will be provided regularly reports on progress and performance.

## **Whistleblower Arrangements**

### Reporting

The Company has established internal reporting channels outlined below for use by Employees, Contractors and Service Providers to report concerns regarding the areas listed above:

- Internal reporting to direct manager in the first instance and if this is not appropriate direct to the Vice President.
- External reporting to a third party independent service provider PKF Forensic & Risk services via Email: [dualhotline@pkf.com.au](mailto:dualhotline@pkf.com.au) or by Phone: 1800 857 376
- Any Whistleblower report can be made anonymously and will be treated in the strictest confidence

### Review and investigation

All matters reported via a Whistleblower channel will be reviewed and investigated by an independent senior manager or third party (PKF Forensic & Risk services) with the outcome tabled with the Company's Board.

Any matter which does not fit within the defined scope of this policy but is reported via the Whistleblower reporting channels will be directed to the most appropriate functional area for review and follow up.

### Reporting and close out

All matters reported and investigated will be documented and tabled with the Company's Board.

Follow up and close out of these matters will be overseen by the Managing Director.

## **Whistleblower Protections**

Any Employee, Contractor or Service Provider, who in good faith, makes a complaint or disclosure about an alleged breach of the Code will not be disadvantaged or prejudiced in the making of such a complaint or disclosure in accordance with the Whistleblower Policy. All reports will be treated as confidential except as required by law or where disclosure may be necessary to regulatory authorities or law enforcement agencies.

## **Related Documents**

Code of Conduct

Anti-bribery and Corporation Policy

Signed: *Mark Le Messurier*

Mark Le Messurier

Managing Director

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