

## **TIMAH RESOURCES LIMITED**

### **WHISTLEBLOWING POLICY (Version 1.0)**

#### **OUR PURPOSE**

##### **1.1 Our Goals & Commitment**

Timah Resources Limited (“Company”) is committed to maintaining a high standard of integrity, investor confidence and good corporate governance. To achieve these, it is crucial that all of our employees and partners understand, follow, and adhere to our corporate values. We have put guidelines and policies in place to ensure we live by these values in our day-to-day work.

Together with our values, we want to have feedback and encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our values.

The goal of this policy is to provide very clear guidelines on how we approach and manage this feedback. With our whistleblowing policy, we aim to ensure:

- Every employee should have the chance to speak up when they feel we are not adhering to our corporate values. They should have a place to report misconduct, every report will be heard and acted on, and we will make improvements based on the results.
- The Company believes everyone should be able to make reports. We commit to protecting informant's identities.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

##### **1.2 Our Commitment**

The Company wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. The Company also wants to let them know about how we, as an organisation, will ensure they are not subject to any retaliation or other abuse because they made a report.

##### **1.3 What Conduct Should Be Reported**

It is important that the Company outlines what behaviour we want to be reported under this policy. We want to hear from you if you witness or know about any behaviour that is:

- Fraudulent;
- Illegal;
- Corrupt;
- Dishonest;
- Unethical;
- Violates the law or any legal code;
- Is creating an unsafe environment;
- Breaches any of our company's policies;
- Discrimination;
- Harassment and/or bullying of any kind;

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- Any conduct which is detrimental to the Company and could cause financial or non-financial loss;

#### **1.4 Who Falls Under This Policy**

The following would be considered an “eligible person” and would fall under the Company’s whistleblowing policy.

- Employees (including directors, managers, staffs, interns, and workers);
- Contractors, consultants, service providers, suppliers, business partners;
- Former employees;

This policy applies to all the Company’s businesses, divisions, and offices. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

### **PROESS FOR MAKING A REPORT**

#### **2.1 What Options Do Employees Have For Making A Report**

If an employee or eligible person would like to make a report, they have different channels available where they can do this.

- Any concern should be reported to the immediate superior. However, if it is not possible or appropriate to do so, the concern should then be reported to the Chief Operating Officer.
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- Upon receipt of the concern, the Chief Operating Officer shall conduct investigation on the issue/concern raised.
- The progress of the investigation shall be reported to the Managing Director and the Executive Chairman.
- Upon completion of the investigation, the Chief Operating Officer shall submit the full report together with recommendation to the Managing Director and the Executive Chairman.
- Actions mandated shall be carried out accordingly.

### **PROTECTION ON INFORMANTS**

An informant might be concerned that staff, management, or the organisation might retaliate against them. In this case, the Company will protect the informant from:

- Being terminated or having their employment ceased;
- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;

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- Discrimination;
- Any other action that can be perceived as retaliation for making a report;

#### **FALSE REPORTING**

A false report of a Reportable Matter could have significant effects on the Company's reputation and the reputations of other staff members and could also cause considerable waste of time and effort. Any deliberately false reporting of a Reportable Matter, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

#### **REVIEW OF POLICY**

The policy will be reviewed periodically and updated in accordance with the needs of the Company and any new regulation that may have an impact on the discharge of the Board's responsibilities.

The policy is made available for reference in the Company's website at [www.timahresources.com.au](http://www.timahresources.com.au)

#### **VERSION CONTROL**

| <b>Version</b> | <b>Date</b> | <b>Author</b> | <b>Changes</b>  |
|----------------|-------------|---------------|-----------------|
| 1.0            | 23.8.2019   | The Board     | First establish |