

# **WHISTLEBLOWER POLICY**

July 2019

# WHISTLEBLOWER POLICY

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## 1 OBJECTIVE

SRL strongly encourages the reporting of any instances of potential or actual misconduct relating to SRL. This Policy sets out how to report such concerns and how confidential reports will be protected.

## 2 WHO CAN MAKE A REPORT?

Anyone can make a report under this Policy who is or has been:

- an officer or employee of SRL;
- a supplier or contractor to SRL (and any employee of that supplier or contractor);

and these people's relatives or dependents (including their spouse's dependents) (referred to in this Policy as **you**).

## 3 WHAT CAN I REPORT UNDER THIS POLICY?

You can report any suspected or actual misconduct (**Misconduct**), including:

- breach of any company code of conduct, policies or the law;
- dishonest, fraudulent, corrupt or unlawful conduct or practices;
- misleading or deceptive conduct, including improper or misleading accounting or financial reporting practices;
- coercion, harassment or discrimination;
- conduct within SRL's control which is a significant danger to the environment;
- conduct endangering the health or safety of any person; or
- any other conduct or act which may cause significant loss (including financial and non-financial loss) to SRL or which may otherwise be detrimental to SRL.

Misconduct does not generally include personal work related grievances<sup>1</sup> unless they have significant implications for SRL or the Iluka Group. SRL has HR policies for raising these grievances and encourages employees to do so. HR policies include the Grievance Policy (including grievance procedures within the *Mining Trade Group Collective Agreement*) and the appeal rights under the Disciplinary Policy. Please see your direct manager or an HR Representative for guidance.

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<sup>1</sup> Personal work-related grievances are grievances relating to your employment that have implications for you personally (such as a conflict between you and another employee or a decision about your promotion). If you are unsure whether the conduct falls under this Policy as Potential Misconduct, or alternatively is a personal work-related grievance, then you can report it under this Policy in the first instance.

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You must not make a report that you know is not true or is misleading. This is misconduct and may result in disciplinary action.

## 4 TO WHOM CAN I REPORT MISCONDUCT?

For current employees, we encourage you to speak to your direct manager in the first instance or an HR Representative, outside of this Policy.

We know that sometimes you may prefer to make a report on a confidential basis. Confidential reports can be made to the persons set out below.

### 4.1 Whistleblower Protection Officer (WPO)

You can report confidentially to a Whistleblower Protection Officer (**WPO**):

**SRL:** Zyna Cole  
SRL Internal Audit Manager

Phone: +232 7680 1413  
Email: [Zyna.Cole@sierra-rutile.com](mailto:Zyna.Cole@sierra-rutile.com)

**Iluka:** Benton Leins  
Business Risk Manager

Phone: +61 8 9360 4964  
Email: [Benton.Leins@iluka.com](mailto:Benton.Leins@iluka.com)

### 4.2 STOPline

You may make a report on a confidential basis or an anonymous report via the external independent whistle-blower service STOPline. Contact details are here: [www.ilukaresources.stoplينerreport.com](http://www.ilukaresources.stoplينerreport.com). STOPline operators are not associated with SRL or Iluka, and are trained specialists in dealing with whistleblower matters.

The STOPline website may mention Australian whistleblower laws. These laws give whistleblowers certain protections and STOPline follows processes according to these laws even if not technically applicable to someone in Sierra Leone.

### 4.3 Other persons to whom you can report confidentially

You may also report confidentially to Iluka's General Counsel and Company Secretary (**General Counsel**):

Sue Wilson  
General Counsel and Company Secretary

Phone: +61 8 9360 4305  
Email: [sue.wilson@iluka.com](mailto:sue.wilson@iluka.com)

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## 5 HOW WILL I BE PROTECTED?

### 5.1 Protecting your identity

If you make a report on a confidential basis, SRL will ensure your identity is not disclosed unless you give your consent or disclosure is required by law. If disclosure is required by law then SRL will notify you as soon as possible, unless it is not practicable or lawful to do so.

If necessary in order to investigate your report, SRL may disclose information (other than your identity) that could lead to someone identifying you, but it will take all reasonable steps to reduce this risk.

If you make a report to a third party as well as to SRL, then your report to SRL is not made on a confidential basis and SRL may not be able to protect your identity in accordance with this section.

### 5.2 Protection from detriment

SRL does not tolerate any detrimental conduct to another person because of a belief or suspicion that the person has made, may have made, or could make a confidential report under this Policy. This is misconduct and may result in disciplinary action.

**Detrimental conduct** includes discrimination, harassment, intimidation, dismissal, demotion, causing physical or psychological harm or personal or financial disadvantage to a person and damaging a person's property.

Anyone who believes they, or someone else, has been subject to detrimental conduct because of a report of Misconduct should report the matter through STOPline or to the WPO immediately.

### 5.3 Other protections available

SRL may provide additional support to you. The WPO will assess the need for additional support with you (unless you have reported anonymously) and take the steps necessary to provide that support.

The appropriate support will vary on a case by case basis, but may include:

- monitoring and managing the people and environment in which the Misconduct is allegedly occurring;
- temporarily changing working arrangements or places of work; and
- providing counselling or other assistance services.

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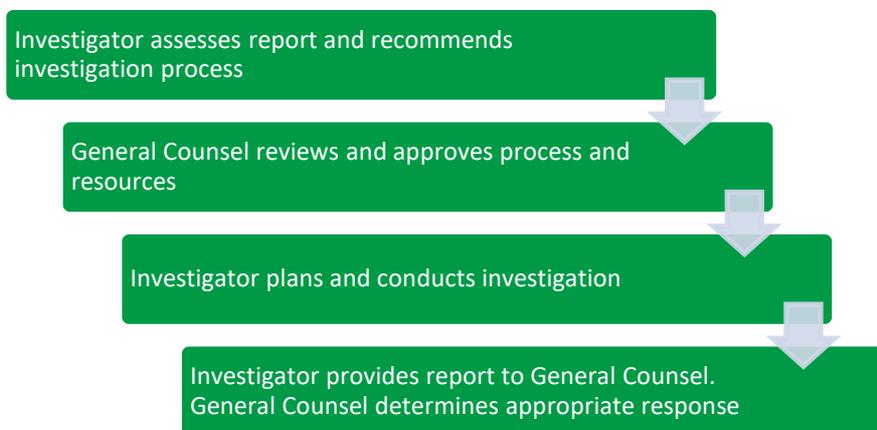
## 6 HOW WILL SRL INVESTIGATE?

All reports under this Policy are assessed by the WPO, and a timely decision will be made about whether it is appropriate to investigate.

Any investigation will be conducted objectively and fairly, in accordance with the confidentiality requirements in section 5, and otherwise as is appropriate having regard to the nature of the report. All employees and contractors must cooperate fully with any investigations and keep investigations confidential.

Where it is appropriate, persons to whom your report relates will be informed of the issues, and will be treated fairly including being given a chance to respond to any allegations made against them.

Investigations are overseen by the General Counsel. The choice of investigator will depend on the nature of the report but will always be someone independent to the subject matter of the investigation. If the matter relates to the General Counsel, the General Counsel will not be involved in the investigation process. The below diagram sets out the general steps for investigations.



Where possible and appropriate, you will be informed of the outcome of your report and relevant actions taken (subject to privacy and confidentiality considerations). You must maintain the confidentiality of all such reports and information.

## 7 MONITORING AND REPORTING

Compliance with this Policy will be monitored on an ongoing basis and biannual reports will be made to the Iluka and SRL Audit and Risk Committee about the operation of this Policy, including information on the number and type of disclosures, action taken and the outcome of any investigations (subject to privacy and confidentiality considerations). This Policy will be reviewed every 2 years to ensure it is operating effectively and determine whether any changes are required.

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## **8 TRAINING**

Relevant employees will receive training on this Policy.