

## Whistle-blower Policy

### The Purpose of this Policy

Cyprium Metals Limited (CYM) is committed to promoting a culture of trust in an environment that encourages reporting of misconduct and unethical behaviour and providing protection to those who speak out.

Individuals are encouraged to report any Concerns about improper conduct and CYM will ensure protection is provided to those who speak up. This Policy also outlines the framework for ensuring that fair and independent investigations of any Concerns raised under this Policy are undertaken and appropriate responsive action is taken where necessary.

### Scope

This Policy applies to:

- CYM and all subsidiary and affiliate entities over which it exercises control; and
- CYM's current and past employees, officers, contractors, suppliers (including employees of suppliers), and associates, as well as their dependents (or their spouse's dependents) and their relatives.

### Types of Concerns

Individuals are encouraged to speak up about any misconduct, anything that they believe to be illegal or unethical, any safety issues, or any breach of our Code of Conduct, including:

- dishonest, fraudulent or corrupt activity;
- illegal activity;
- unethical behaviour, breaches of our policies or standards;
- conduct or practices that present a real risk of damage or harm to us, our people or third parties;
- conduct or practices that may cause financial loss to us or damage our reputation;
- harassment, discrimination, victimisation or bullying;
- a breach of any law which may impact our business operations;
- a breach of any Australian tax law or misconduct in relation to our tax affairs; or
- any other kind of serious impropriety,  
(together referred to as Concerns).

For current employees, we encourage you to raise the matter with your supervisor in the first instance.

### Reporting of Concerns

Where an individual would like to raise a Concern, they are to report the matter to the Company Secretary:

Wayne Apted

Ph +61 8 6169 3050

email: [wayne.apted@cypriummetals.com](mailto:wayne.apted@cypriummetals.com)

There must be objective and reasonable grounds for any Concerns raised. It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and are made maliciously or known to be false.

If an individual is not comfortable speaking the Company Secretary on a matter or if they are unavailable and the matter is urgent, they should contact the Executive Director or the Chairman.



## **Reporting**

At their discretion, the Company Secretary shall advise the Chairman and/or Executive Director of the Concern having consideration to any anonymity wishes of the individual raising the Concern and the circumstances of the matter. The Board of Directors will be notified about relevant Concerns and provided with a report on the findings of the Concern raised.

## **Investigation of Concerns**

All Concerns reported will be promptly investigated and, if warranted, appropriate corrective action will be taken. Investigations will be conducted in an objective and fair manner, in line with the Company's values and procedures. Where appropriate, feedback will be provided to the individual who raised the Concern regarding the investigation's progress and/or outcome.

## **Confidentiality and Anonymity**

Reports of Concerns will be kept confidential and may only be disclosed to outside parties with the consent of the individual raising the Concern to the extent possible, consistent with the need to conduct an adequate investigation.

There is no obligation for an individual raising a Concern to reveal their identity and they may request that their identity remain confidential and known only to the Company Secretary and/or other person to whom the Concern was reported to. If the Concern is reported anonymously, the Company Secretary or other person to whom the Concern was reported to, is required to preserve that person's anonymity and will not disclose their identity except with their consent.

It is important to understand that in some situations where an individual has chosen for their identity to remain anonymous, can limit or prevent the Company's ability to effectively investigate the matter or to take appropriate action. If this is the case, the individual will be contacted to discuss the matter further and explain the limitations caused and protections that can be provided, so that they can make an informed choice about whether to remain anonymous.

## **Protection from retaliation**

CYM will not tolerate any reprisals, discrimination, harassment, intimidation or victimization of an individual raising a Concern and it is committed to protecting individuals from Detrimental Treatment by anyone who believes or suspects that a report has, may or is proposed to be made. Detrimental Treatment includes dismissal, injury, demotion, harassment, discrimination, disciplinary action, bias, threats, damage to property, reputation or a person's business or financial position or other adverse treatment connected with speaking out.

If a person is subjected to Detrimental Treatment as a result of making a report under this Policy, or if they are aware of or suspect another person has been subjected to Detrimental Treatment, it should be reported immediately to your supervisor, the Company Secretary, Executive Director or Chairman.

## **Fair treatment**

CYM is committed to treating all persons involved in a Concern fairly, including where the name of a person is raised by someone who is speaking up about a Concern, as appropriate in the circumstances. All investigations undertaken under this Policy will be conducted in accordance with principles of procedural fairness.

## **Other protections**

In addition to this policy, protections are included under Part 9.4AAA of the Corporations Act 2001.

## **Other Policies**

This Policy should be read in conjunction with CYM's Code of Conduct, Anti-bribery and Corruption Policy and Corporate Health and Safety Policy.