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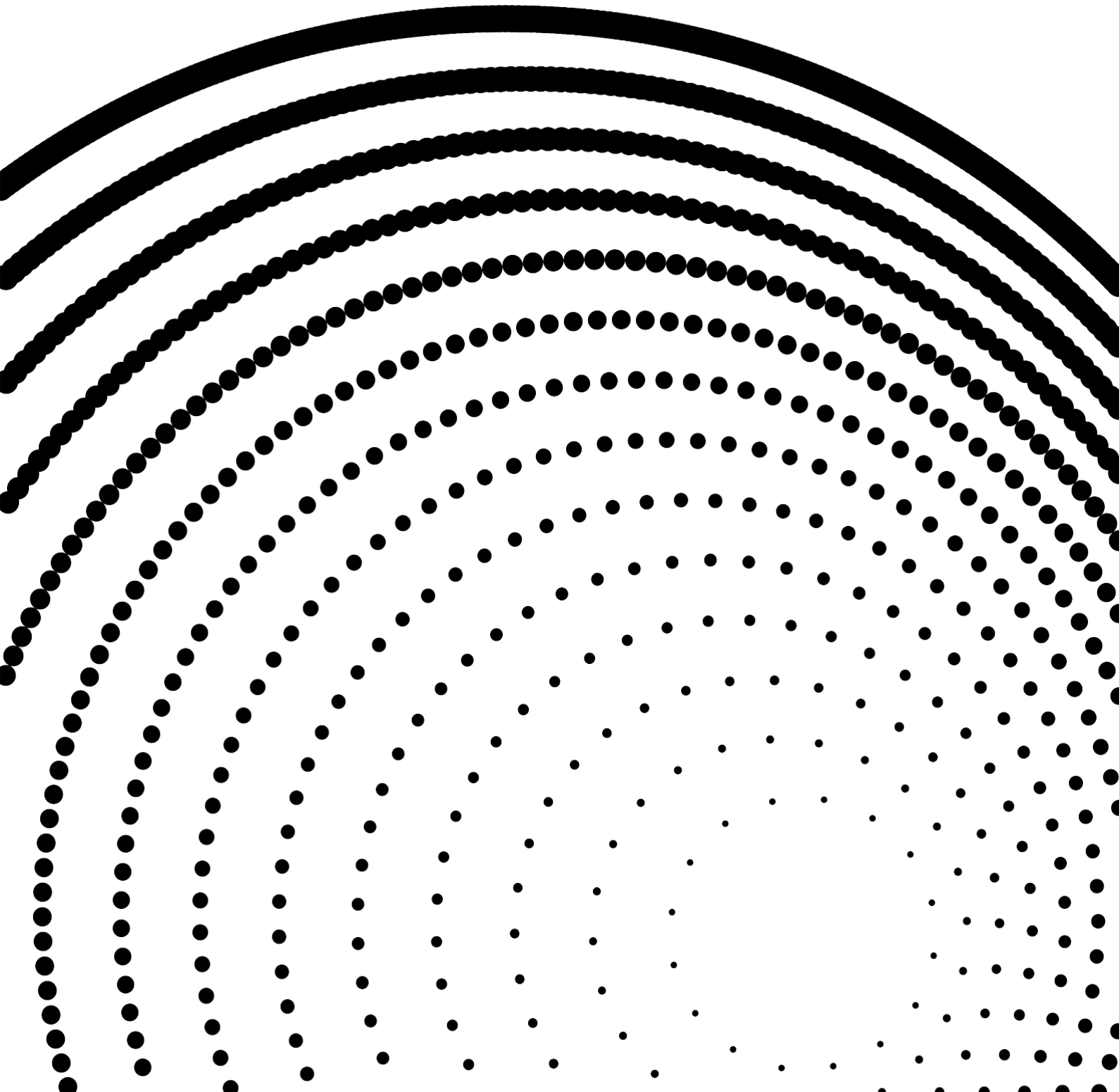
# Whistleblower Policy 2024



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Molycop Legal & Compliance Department

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## Whistleblower Policy

In this Whistleblower Policy (this Policy), Molycop means any company or business within the Molycop group of companies and businesses, including any other companies and businesses that may be acquired by or form part of the Molycop group from time to time.

Molycop is committed to high standards of conduct in all of its business activities, and to promoting and supporting a culture of honest and ethical behavior, compliance and good corporate governance.

Molycop encourages any person who becomes aware of any Reportable Conduct to raise those concerns in accordance with this Policy.

**Molycop will make this policy available:**

- to all existing officers, employees
- to all new officers, employees as part of the onboarding process
- to all contractors
- on Molycop’s external website.

### 1.0 When should a report be made?

If you become aware of any information or circumstances that you have reasonable grounds to suspect involve misconduct or an improper situation in relation to Molycop, you should raise your concerns promptly.

**What are the conducts you should report (“Reportable Conduct” - includes potential or actual)?**

- corruption (e.g. bribes)
- fraudulent behavior (e.g. falsifying documents)
- illegal activity (e.g. theft, violence)
- breach of any law, regulation, internal policy or code
- endangerment to the health and safety of others or potential damage to the environment
- inappropriate workplace behavior (e.g. bullying, harassment and discrimination) maladministration (e.g. unjust, based on improper motives, unreasonable, oppressive or negligent)
- actions that may cause financial or non-financial loss to Molycop or be otherwise detrimental to the interests of Molycop, or
- concealment of any Reportable Conduct.

**If you become aware of Reportable Conduct, you should immediately report it to any of the following:**

- The main avenue to be used for reporting should be Molycop’s Ethics & Integrity Channel following this link: <https://molycop.trusty.report/>.
- In addition to the Ethics & Integrity Channel, Molycop offers several alternative methods for reporting complaints, ensuring accessible and varied options for voicing concerns:



**All reports can be made anonymously.**

If you are unsure whether conduct would be considered Reportable Conduct under this Policy, you should discuss your concerns on an informal basis with one of the people mentioned above or please report it.

### 2.0 Investigation

Molycop will investigate all cases of Reportable Conduct in a timely, confidential, objective and fair manner.

Molycop will do everything reasonably possible to ensure the details of any person who reports Reportable Conduct and any details of the Reportable Conduct that may identify them will remain confidential and will not be disclosed unless required by law.

Molycop is committed to adhering to the Internal Investigation Process Guide for all internal and external investigations to ensure consistency and compliance throughout the investigative process.

### 3.0 Whistleblower Protection

The following persons are afforded protection under this Policy when disclosing Reportable Conduct:

- an officer of Molycop
- an employee of Molycop
- an individual who supplies goods or services to Molycop (whether paid or unpaid)
- an employee of a person who supplies goods or services to Molycop (whether paid or unpaid)
- an individual who is an associate of Molycop, and
- a relative or dependent of any individual listed in the 5 preceding dot points.

If any of the above listed people report Reportable Conduct in accordance with this Policy, they will not be subjected to any damage arising from reprisal due to that report, including:

- if the person is a Molycop employee:
  - dismissal
  - injury in his or her employment with Molycop
  - alteration of duties to his or her disadvantage, or
  - discrimination between the person and other Molycop employees.
- harassment or intimidation harm or injury (including psychological harm)
- damage to property, reputation or business or financial position, or
- any other damage to a person.

### 4.0 Non-Retaliation

Molycop is committed to maintaining a workplace where all employees can freely raise concerns and report misconduct without fear of retaliation. In accordance with our commitment to integrity and transparency, any employee who, in good faith, reports a violation of our policies or participates in an investigation will be protected. Retaliation against any employee who reports wrongdoing or assists in an inquiry is strictly prohibited.

This policy ensures that all employees feel supported and secure in their ability to contribute to an ethical workplace. Any acts of retaliation will be met with appropriate disciplinary action, up to and including termination of employment. Molycop encourages all employees to speak up about any concerns and assures them that they can do so safely, without any adverse consequences.



**Jim Anderson**

Chief Executive Officer

August 2024