



GMA Garnet Group

WHISTLEBLOWER POLICY

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002	30.3.2021	CEO	EXECUTIVE CHAIRMAN	REORDERED AND UPDATED PDOS	
003	02.03.2026.	Company Secretary	Boad of Directors (Garnet International Resources Pty Ltd	Align with Jebesen and Jessen process, amend to global policy.	

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1. Purpose

GMA is committed to the highest standards of conduct and ethical behaviour in all of our business activities. As part of that commitment and as part of fulfilling GMA's responsibilities under the GMA Sustainability Framework, GMA has established this policy to:

- encourage the reporting of suspected unethical, illegal, fraudulent or undesirable conduct;
- to help deter wrongdoing; and
- to provide protections for persons who make a report.

This Policy is available to all GMA Personnel on the GMA website and will be made available to all new GMA employees on commencement of their employment.

Some countries, states/provinces have specific laws associated with whistleblowing. This Policy may be supplemented by local guidance in accordance with those laws. Where there is a local law that applies, it shall take precedence where inconsistent with the Policy. Please consult your regional People & Sustainability Manager.

This policy applies to all employees and directors of GMA.

2. What matters can be disclosed under this policy?

You may make a report under this policy if in good faith (see note on Australian operations) if you suspect that a GMA Officer, employee, contractor or supplier has engaged in improper conduct in relation to GMA's business activities.

AUSTRALIAN OPERATIONS

You may make a report under this policy if you have reasonable grounds for your suspicions, and are not required to meet the good faith provisions. The motives or opinions of those involved in the matter being reported are not relevant to the objective assessment of the reasonable grounds.

Examples of Reportable Conduct include:

- Conduct that is dishonest, fraudulent or corrupt, including bribery or conduct involving improper payments or inducements.
- Illegal conduct such as theft, violence, harassment, criminal damage to property or conduct that breaches any laws of countries in which GMA operates.
- Misconduct relating to the governance of GMA, such as dishonestly altering company records, adopting questionable accounting practices, or intentionally providing false information in internal management reports.

- Conduct that may cause financial loss to GMA or damage its reputation or is otherwise detrimental to GMA.
- Conduct which amounts to an abuse of authority.
- Conduct that represents a danger to the public (including public health, safety or the environment).
- Any other conduct which involves misconduct or an improper state of affairs or circumstances relating to GMA.

AUSTRALIAN OPERATIONS

In Australia, conduct that constitutes an offence against, or a contravention of the Commonwealth laws listed in Schedule 1.

You **cannot** make a report under this policy about a personal work grievance. Any complaints of injustice in the assessment of an employee's performance, or discrimination, will be dealt with under the appropriate GMA policy.

You **cannot** make a report under this policy which you know to be untrue.

3. Who can make a report under this policy?

A report can be made by a current or former:

- GMA Officer or employee;
- contractor who supplies goods or services to GMA, or one of their employees;
- associate of GMA; or
- a family member of a person mentioned above.

You can make a report anonymously if you wish.

4. Who can I make a report to?

You may raise concerns related to the issues outlined in Clause 2, with the following people:

- Chief Executive Officer
- Chief Financial Officer
- Any member of the Executive Committee
- Group People & Sustainability Manager
- People & Sustainability Manager Australia, People & Sustainability Manager Middle East, Vice President-HR USA
- Group Financial Controller

Alternatively, you may also report directly to our parent company's Chairman at right-to-speak@jjsa.com.

AUSTRALIAN OPERATIONS

In Australia, in order to qualify for protection as a Whistleblower under Australian Whistleblower Laws, you must provide your report directly to one of the following:

- Chairman of the Board
- an Officer or Senior Manager of the Company or a Related Body Corporate;
- an auditor, or a member of an audit team conducting an audit of GMA;
- if the report relates to GMA's tax affairs, GMA's registered tax agent or BAS agent or an employee or officer at GMA who has functions or duties relating to its tax affairs;
- ASIC or APRA; or
- a legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the Australian Whistleblower Laws.

A report made to a journalist or a parliamentarian may also qualify for protection under the Australian Whistleblower Laws if it satisfies the criteria for the report to be either a public interest disclosure or an emergency disclosure in accordance with the provisions of those laws.

5. Will my identity as a Whistleblower be kept confidential?

GMA will only disclose your identity as a whistleblower if:

- you consent; or
- your identity is disclosed to a legal practitioner for the purpose of obtaining legal advice or representation.
- or as required by local whistleblowing laws.

AUSTRALIAN OPERATIONS

In Australia we may also disclose your identity if your identity is disclosed to the Australian Securities and Investment Commission (ASIC), the Australian Prudential Regulation Authority (APRA), the Australian Federal Police or the Tax Commissioner.

If GMA investigates a report, any disclosure of information likely to reveal your identity will be made on a strictly confidential basis and only if:

- your identity has been removed from the information,
- we have taken reasonable steps to reduce the risk that you will be identified from the information; and
- it is reasonably necessary to disclose the information for the purpose of investigating the issues raised in a report.

Unauthorised disclosure of a whistleblower's identity or of information that is likely to lead to the identification of that person is a breach of this Policy. GMA may take disciplinary action against any personnel who make an unauthorised disclosure under this Policy.

AUSTRALIAN OPERATIONS

In Australia, unauthorised disclosure of a whistleblower's identity is also an offence under the Australian Whistleblower Laws (see section 9 below).

The Australian Whistleblower Laws provide additional protections in relation to the confidentiality of Whistleblowers (see section 9 below).

6. Will I have protection and support available to me as a whistleblower?

GMA is committed to protecting and respecting the rights of any GMA person who reports improper conduct in accordance with this policy.

GMA will not tolerate any reprisal (including dismissal or demotion), discrimination, bias, harassment, intimidation or victimization against any person who had made, or is suspected of making, a report of improper conduct, or against that person's colleagues, employer (if a contractor), relatives, or any other person where the reason for the detrimental conduct relates to the suspicion that a person has made a report of improper conduct.

Personnel found to have caused or threatened to cause detriment to a person who is, or is suspected of being, a whistleblower may be subject to disciplinary action including, in serious cases, dismissal.

If you believe you have suffered detriment as a result of making a report under this policy, or because it is believed or suspected that you have made a report under this policy, you should inform your supervisor or manager as soon as possible or raise the matter with a person listed as a recipient of a disclosure under Clause 4.

See also section 9 of this Policy in relation to the protections available under the Australian Whistleblower Laws.

7. How will a report be investigated?

All reports will be taken seriously.

Any person (as outlined in Clause 4) who receives a disclosure must, as soon as practicable, determine whether the disclosure falls within the scope of this policy and qualifies for protection. If the disclosure falls within the scope of the policy, the recipient must first assess if there is sufficient information to commence an investigation and if so, begin an investigation as soon as practicable. If the person has a conflict of interest with the subject matter of the report, they must decline to take any further steps in relation to the report other than to refer the matter to an alternative person (as outlined in Clause 4, in consultation with the whistleblower).

Any person who receives a disclosure must, as soon as practicable, inform the CEO or the Chairman. Information to be communicated will include the subject matter of the disclosure, the type of person who made the disclosure (an employee, customer, supplier etc), and their status (eg. Whether they are still employed or contracted by GMA), as well as actions taken to date.

The investigation must be conducted in an objective and fair manner, ensuring to provide an employee who has been adversely mentioned in information provided by a whistleblower an opportunity to respond to the allegations made in respect of them, prior to an adverse finding being made. An investigator may be appointed to conduct or assist in the investigation of a reported disclosure. GMA may engage relevant experts for the purpose of assisting in investigating the matter.

Where appropriate and possible, GMA will provide feedback to the whistleblower regarding the commencement, progress and outcome of the investigation of their report (subject to considerations of the privacy of those against whom allegations are made).

There may be limitations to the investigation process, for example, if GMA is not able to contact the person making the report. A limited disclosure may be investigated via a broad review of the subject matter of the disclosure or work area.

The findings and outcome of the investigation of a report must be documented in a final report which must be provided to the CEO, who may in turn provide a copy to the Board.

Final reports relating to investigations where accusations of wrongdoing are levelled against any of GMA's executive leaders, including the CEO, must be provided to the Chairman.

All files and records created from an investigation will be retained securely.

OUR PARENT, JEBSEN & JESSEN Pte Ltd

The CEO will report matters under this Policy to the Chairman of the Jebesen & Jessen Pte Ltd Board.

Reports made to Jebesen & Jessen Group of Companies will be handled in accordance with their Whistleblowing Policy & Procedure GM217a which can be accessed on Morus.

8. Fair treatment

Where investigations or other enquiries in respect of a report do not substantiate that Reportable Conduct has occurred:

- the fact the enquiry has been carried out
- the results of the enquiry; and
- the identity of any person the subject of the enquiry,

will remain confidential, unless the subject of the enquiry requests otherwise.

A person who is subject to a disclosure, is entitled to be treated fairly in accordance with principles of natural justice and procedural fairness prior to any adverse finding. There is no obligation for GMA to advise the person subject of a disclosure immediately that a disclosure has been received or if an investigation has commenced. In fact, advising an employee too soon may compromise an investigation. However, prior to any adverse findings being filed against a person subject to a reported disclosure, they have the right to:

- be informed as to the substance of the allegations against them;
- be given a reasonable opportunity to put their case (either orally or in writing) to the company; and
- be informed of the findings in respect of the allegations against them; and
- seek assistance of the company's employee assistance program.

9. Australian Whistleblower Laws

If you make a report, including an anonymous report, in accordance with this policy you will qualify for the following protections under the Australian Whistleblower Laws, in addition to the other protections set out in this policy:

- You will be protected from civil, criminal or administrative liability (including disciplinary action) for making the report. You will not, however, be granted immunity for any misconduct you have engaged in.
- No contractual or other remedy may be enforced, and no contractual or other rights may be exercised, against you on the basis of your report.

- In certain circumstances, the information contained in your report is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty.
- Your identity cannot be disclosed to a court or tribunal except where the court or tribunal considers it necessary.
- A person who receives your report commits an offence if they disclose your identity, or they disclose information which is likely to lead to your identification, to anyone except ASIC, APRA, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report without your consent (see also section 5 above).

The Australian Whistleblower Laws provide that a person must not cause or threaten to cause detriment to a whistleblower in relation to a report. They also provide that a whistleblower can seek compensation and other remedies through the courts in relation to a range of parties, including their employer, if they have suffered an unlawful detriment.

10. US Whistleblower Laws

This policy is intended to comply with and incorporate all applicable federal whistleblower protection laws. Employees are protected under numerous federal statutes, including but not limited to:

- **Dodd-Frank Act:** Provides protection and potential monetary awards for reporting securities violations to the Securities and Exchange Commission (SEC).
- **Occupational Safety and Health Act (OSHA):** Protects employees who raise concerns about workplace safety and health.
- **False Claims Act (FCA):** Protects individuals who report fraud against the federal government, and in some cases allows whistleblowers to share in recoveries.

Other federal laws: Additional protections exist under statutes covering environmental regulations, transportation, consumer product safety, food safety, and financial services, among others.

Nothing in this policy is intended to limit or interfere with employees' rights under federal law. Employees may report concerns directly to appropriate federal agencies, including but not limited to the U.S. Department of Labor, OSHA, the SEC, or other regulatory authorities, without first reporting internally.

11. Policy management

Approval of this policy is vested with the Garnet International Resources (GIRL) Board. Reviews of this policy are the responsibility of the Board and will be conducted periodically to ensure the policy remains consistent with the Corporations Act and all other relevant legislative and regulatory requirements, as well as the changing nature of GMA.

The Company Secretary is authorised to make administrative and minor amendments to this policy provided such amendments are presented to the board for consideration at its next meeting.

12. Definitions

In this Policy:

APRA means the Australian Prudential Regulation Authority.

ASIC means the Australian Securities and Investments Commission.

Associate has the meaning given to that term under the Corporations Act.

Australian Whistleblower Laws means either or both of Part 9.4AAA of the Corporations Act and Part IVD of the Taxation Administration Act 1953 (Cth).

Board means the board of Directors of the Company from time to time.

CEO means the Chief Executive Officer of GMA.

Chairman means the person appointed by the Board as chairman from time to time.

Company means Garnet International Resources Pty Ltd.

Company Secretary means the person appointed by the Company to be the company secretary from time to time.

Corporations Act means the Corporations Act 2001 (Cth).

Detriment includes, without limitation, dismissal, demotion, harm or injury, alteration of an employee's position or duties to their disadvantage, harassment, intimidation, discrimination or damage to a person's property, reputation, business or financial position.

Director means any person holding the position of a director of the Company and includes an alternate director and **Directors** means the directors for the time being of the Company or as the context permits such number of them as have authority to act for the Company.

GMA means Garnet International Resources Pty Ltd and its subsidiaries from time to time.

Officer is a director or secretary of the corporation, and has the meaning given to that term by section 9 of the Corporations Act.

Personnel means Officers, Senior Managers or employees of GMA.

Personal Work-Related Grievance means a grievance about any matter in relation to the discloser's employment, or former employment, having (or tending to have) implications for the individual personally and where the information disclosed:

- a) does not have significant implications for the entity to which it relates, or another entity, that does not relate to the discloser; and
- b) in Australia, it does not concern conduct, or alleged conduct, referred to in clause 1317AA(5)(c),(d),(e) or (f) of the Corporations Act.

Policy means this Whistleblower Policy.

Related Body Corporate has the meaning given to that term under the Corporations Act.

Report means a disclosure of conduct which there are reasonable grounds to suspect is Reportable Conduct under this Policy.

Reportable Conduct has the meaning given by clause 4 of this Policy.

Senior Manager means a person (other than an Officer of the Company) who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the Company or a Related Body Corporate, or who has the capacity to affect significantly the Company's or a Related Body Corporate's financial standing.

Whistleblower means a person who is eligible for protection as a Whistleblower under this policy or under the Australian Whistleblower Laws.

Schedule 1 – Commonwealth Laws (see clause 2)

- *The Corporations Act 2001;*
- *The ASIC Act 2001;*
- *The Banking Act 1959;*
- *The Financial Sector (Collection of Data) Act 2001;*
- *The Insurance Act 1973;*
- *The Life Insurance Act 1995;*
- *The National Consumer Credit Protection Act 2009;*
- *The Superannuation Industry (Supervision) Act 1993;*
- An instrument made under these Acts; or
- Any law of the Commonwealth where the Reportable Conduct constitutes an offence against that law and is punishable by imprisonment for a period of 12 months or more.