



# Whistleblower Policy

## Purpose

At MRL, it is expected that all employees embody our values and “OneMRL” ethos in all of our business activities.

The Whistleblower Policy (this Policy) is designed to support and assist the Group to promote a culture of ethical corporate behaviour, thereby providing an environment in which internal and external stakeholders are able to report any issue they genuinely believe breaches MRL’s Code of Conduct and Business Integrity, or any other reportable conduct.

This Policy outlines MRL’s commitment to promoting a culture of ethical corporate behaviour, providing internal and external channels to report reportable conduct and providing adequate protection for whistleblowers.

## Scope

This Policy applies to all MRL Stakeholders, defined for this purpose as employees (including contractors and consultants) and Directors for all entities within the MRL Group.

Reportable Conduct may include any conduct that involves:

- Actions that are dishonest, fraudulent or corrupt, including bribery or other activity in breach of the Bribery and Corruption provisions of the MRL Code of Conduct and Business Integrity
- Illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law)
- Unethical behaviour or behaviour in breach of MRL’s policies or procedures
- Potential damage to MRL stakeholders such as unsafe work practices, environmental damage, health risks or abuse of MRL’s property or resources
- Abuse of authority
- Financial loss to MRL, damage to MRL’s reputation or any other issue that may be detrimental to MRL’s interests
- Harassment, discrimination, victimisation or bullying, or
- Any other kind of misconduct, observation or perception of an issue that may impact MRL in any of the areas outlined above.

The Whistleblower Policy should be read in conjunction with the following MRL documents:

- MRL Code of Conduct and Business Integrity
- MRL Whistleblower Procedure

## Our Commitment

We commit to:

- Promote a culture of honest and ethical behaviour.



- Provide internal and external channels through which a person who becomes aware of reportable conduct may report its occurrence.
- Provide an external independent Whistleblowing service, MinRes Integrity Assist, to allow for reporting of reportable conduct. Details of this service are available at [www.minresintegrity.deloitte.com.au](http://www.minresintegrity.deloitte.com.au)
- Allow for anonymous reporting of reportable conduct.
- Investigate all matters reported as soon as is practicable after the matter has been reported.
- Protect whistleblowers and ensure confidentiality associated with matters of reportable conduct.
- Take all reasonable steps to ensure that a Whistleblower is not subject to any form of victimisation, discrimination, harassment, demotion, dismissal or prejudice, as a result of having lodged a report.

## **Our Goals**

MRL aims to promote and uphold a culture of ethical corporate behaviour supported by adequate reporting channels and protections for whistleblowers.

## **Our Responsibility**

MRL shall continue to take a proactive approach to promote a culture of ethical corporate behaviour. Leaders at all levels in the group are required to communicate this policy to all employees, contractors and visitors and involve them in its implementation. Every employee has a responsibility to comply with this policy and any associated policies, procedures or processes.

This policy will be periodically reviewed, revised and re-published where necessary to ensure it remains relevant and appropriate to MRL's activities.

A handwritten signature in blue ink, appearing to read "Mark Wilson".

**Mark Wilson**

**Company Secretary**

**18 September 2019**