

WHISTLEBLOWER  
STANDARD



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At Aurelia, we value Integrity – we do what’s right. Aurelia relies on its stakeholders to maintain and enhance a culture of honest and ethical behaviour. We do not tolerate any conduct that is illegal, unacceptable or undesirable.

Aurelia encourages speaking up at the earliest opportunity where a person has reasonable grounds to suspect misconduct. This Standard outlines the protections available to whistleblowers and the process that will be followed when a disclosure is made, to encourage people to come forward with their concerns. All disclosures made under this Standard are treated seriously and will be carefully considered.

This Standard covers Aurelia Metals Limited (**Aurelia**) and its related body corporates (collectively referred to in this Standard as an **Aurelia Company**).

## 1. Purpose

The purpose of this Standard is to:

- support Aurelia’s vision, values and Code of Conduct (The Aurelia Way);
- outline the protections available to individuals who disclose wrongdoing;
- ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will not suffer detriment and will be supported by Aurelia;
- ensure that whistleblower disclosures are handled with appropriate sensitivity and on a timely basis;
- provide transparency regarding Aurelia’s processes for receiving, handling and investigating whistleblower disclosures;
- encourage stakeholders to have the confidence to speak up and disclose wrongdoing;
- help deter wrongdoing; and
- comply with the whistleblower protections in the *Corporations Act 2001* (Cth).

## 2. Am I a Whistleblower?

You do not need to state that you are a whistleblower or ask that you be treated as a whistleblower under this Standard – you will automatically get the protections in this Standard if the below criteria apply to you. If you suspect any Reportable Conduct (see section B below), you are encouraged to make a disclosure. You can make your disclosure anonymously if you feel more comfortable reporting that way.

### A. Your role as an Aurelia stakeholder

You are a current or former:

- employee or officer of an Aurelia Company (e.g. permanent, part-time, fixed term or temporary employees, interns or secondees);
- individual who supplies services or goods to an Aurelia Company (whether paid or unpaid) – this includes consultants and contractors working for an Aurelia Company;
- employee of a person who supplies goods or services to an Aurelia Company (whether paid or unpaid);
- individual who is an associate of Aurelia Metals Limited (e.g. a director or secretary of Aurelia Metals Limited, a related body corporate, or a director or secretary of a related body corporate); or
- relative, dependant or spouse of any of the above (e.g. relatives, dependents or spouses of current or former employees, officers, contractors, consultants, services providers or suppliers).

## B. What is Reportable Conduct?

Any matter that you genuinely believe is in breach of Aurelia's Code of Conduct, or of the law, should be reported in accordance with this Standard. This may include any conduct or behaviour (actual, suspected or attempted) that is:

- criminal, dishonest, unethical, fraudulent, misleading, deceptive or corrupt;
- in breach of the law or other failure to comply with any legal obligation;
- a serious risk to public health, public safety or the environment;
- inappropriate workplace behaviour including bullying, harassment, victimisation and sexual harassment;
- concerning in relation to modern slavery or human rights risks;
- likely to give rise to questionable accounting or auditing practices;
- likely to cause material financial, non-financial or reputational risk to Aurelia; or
- a breach of Aurelia's Code of Conduct, The Aurelia Way.

In this Standard, this conduct is called **Reportable Conduct**. This does not include rumours of Reportable Conduct or hearsay.

Examples of Reportable Conduct include:

- theft, violence or threatened violence or criminal damage to property;
- fraud, offering or accepting a bribe, money laundering or misappropriation of funds;
- knowingly breaching the law or a regulatory approval;
- receiving a benefit due to an undisclosed conflict of interest; and
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure under this Standard or is believed or suspected to have made or be planning to make a disclosure (i.e.: retribution or victimisation) (see paragraph 6.2 below).

You can still qualify for protection under this Standard, even if your disclosure turns out to be incorrect. However, you must not deliberately lodge a false report (that is, a disclosure that you know to be untrue) (see paragraph 14 for further information). This does not mean that you should not make a disclosure if you have reasonable grounds to suspect misconduct, but you may not have all the details.

Reportable Conduct can include the conduct of a third party such as a supplier or service provider.

## C. Your concern is not a personal work related grievance

This Standard does not apply to personal work-related grievances. A matter is a personal work-related grievance if it relates to your employment or former employment with Aurelia and has implications for you personally but:

- does not have significant broader implications for Aurelia; and
- does not relate to anything done or alleged to be done by the person in relation to Reportable Conduct.

This could be matters such as:

- an interpersonal conflict between you and another member of Aurelia's personnel;
- a decision relating to your engagement or the terms and conditions of engagement, including a decision regarding any transfer, promotion or opportunity;
- raising with you matters relating to your performance in your role or any other matters arising in the ordinary course of your engagement; or
- a decision to suspend or terminate your employment or engagement, or disciplinary decisions in relation to your employment.

Concerns about these matters should be made to your manager or raised in accordance with Aurelia's Fair Treatment Standard.

However, a personal work-related grievance may qualify for protection under this Standard if:

- it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed report);
- an Aurelia Company has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond your personal circumstances;
- you suffer from or are threatened with detriment for making a disclosure; or
- you seek legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

If you believe that this describes your situation, then it is recommended that you seek advice from a Whistleblower Protection Officer.

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**D. To whom your disclosure is made**

You must make your disclosure to:

- one of Aurelia's Whistleblower Protection Officers (see paragraph 4 below);
- any officer or senior manager of Aurelia (for example, any member of the Board, the Company Secretary or a person at General Manager level or above); or
- Stopline (an independent, external whistleblower service provider) (see paragraph 4 below).

Subject to this Standard, it is likely disclosures made to officers and senior managers of Aurelia will be referred to a Whistleblower Protection Officer.

However, if you make a disclosure to any of the individuals or entities referred to in paragraph 13 below, then those disclosures will also be protected under this Standard even if you have not made a disclosure directly to Aurelia.

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### 3. Advice on whether a matter is Reportable Conduct

You may wish to first discuss the Reportable Conduct informally with your manager or Human Resources advisor in order to determine whether serious misconduct has occurred. This is an opportunity to clarify the incident, ask questions and determine whether the matter falls under this Standard. At all times, it is expected that these discussions will remain confidential.

If you do not think discussing the matter with your manager is appropriate, or you are unsure whether something you are concerned about is Reportable Conduct or you wish to obtain more information before you make a disclosure, we would encourage you to seek confidential guidance from a Whistleblower Protection Officer (details below at paragraph 4).

### 4. How do I make a disclosure of Reportable Conduct?

You can make your disclosure of Reportable Conduct to an internal Aurelia Whistleblower Protection Officer, or alternatively to Aurelia's independent external whistleblower service provider, Stopleveline. You should choose which method you feel most comfortable with.

Disclosures can be made on a confidential basis and can also be made on an anonymous basis (see paragraph 7 below).

#### Whistleblower Protection Officers

Aurelia's Whistleblower Protection Officers are:

Chief Financial Officer (Martin Cummings)	martin.cummings@aureliametals.com.au Tel: +61 (0) 408 197 077
General Counsel and Company Secretary (Rochelle Carey)	rochelle.carey@aureliametals.com.au Tel: +61 (0) 466 746 467
Non-Executive Director (Susie Corlett) (Chair of Sustainability and Risk Committee)	susie.corlett@aureliametals.com.au Tel: +61 (0) 408 015 216

They can be contacted directly on the details above or alternatively:

- Mail: Whistleblower Protection Officer, GPO Box 7, Brisbane QLD 4001
- In Person: Level 17, 144 Edward Street, Brisbane QLD 4000

#### Stopleveline

Disclosure can also be made to Stopleveline, which is a confidential service operated by an independent third party. Where you provide your disclosure to Stopleveline, that information will be forwarded to a Whistleblower Protection Officer.

If you make your disclosure through Stopleveline, you can keep your identity confidential and ask that it not be disclosed to the Whistleblower Protection Officers. In that instance, only the information you report and not your identity will be forwarded to the Whistleblower Protection Officers.

**Stopline's contact details are:**

Telephone 1300 304 550

Website <https://aureliametals.stoplinereport.com/>

Email aureliametals@stopline.com.au

Mail Attention: Aurelia Metals, c/o Stopline, PO Box 403, Diamond Creek VIC 3089

Disclosures may be made 24 hours a day, 7 days a week. The Stopline telephone line operates from 8am until 6pm (AEST) on weekdays (excluding public holidays). Telephone calls received outside of these hours will be forwarded to the Stopline message bank and will be received and acted upon on the next business day.

## 5. What information should I provide in a disclosure?

To enable thorough consideration of your disclosure, including to determine whether an investigation is required, please provide as much detail as possible. You should include the following details (if available):

- (a) the names of all parties involved in the alleged conduct;
- (b) a detailed description of the conduct complained of;
- (c) a list of all relevant witnesses;
- (d) details of when and where the conduct occurred (date, time, location etc.); and
- (e) what records may exist that would be useful for an investigator to review (e.g. receipts, file notes, emails, etc.) or any other relevant documentation.

You are not expected to investigate your concerns or to provide for their validity before making a disclosure of Reportable Conduct.

## 6. What protection and support is available to me?

### 6.1. Protection of identity and confidentiality

Your identity may only be disclosed:

- (a) with your consent;
- (b) to the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulation Authority (**APRA**) or the Australian Federal Police (**AFP**); or
- (c) to a legal practitioner for the purpose of obtaining legal advice in relation to the operation of the whistleblower provisions in the Corporations Act and this Standard.

You should, however, be aware that it may be necessary for Aurelia to share information that is likely to reveal your identity (i.e. not your actual identity) so that it can investigate your disclosure. If this occurs, Aurelia will take all reasonable steps to reduce the risk that you can be identified.

It is illegal for a person to identify you, or disclose information that is likely to lead to your identification, other than in accordance with the exceptions listed above.

Aurelia takes these obligations seriously. Aurelia will protect your confidentiality by:

- (a) redacting any personal information (unless you consent to this information being disclosed);
- (b) referring to you in a gender-neutral context;
- (c) if possible, contacting you to help identify aspects of your disclosure that could inadvertently identify you;
- (d) ensuring any electronic and hard copy files are stored securely;
- (e) ensuring information in relation to a disclosure will only be provided to those directly involved in managing or investigating the disclosure; and
- (f) ensuring communications or documents in relation to a disclosure or investigation will not be able to be accessed by other staff.

If you are concerned that your confidentiality has been breached, then we encourage you to lodge a complaint with a Whistleblower Protection Officer at first instance.

## 6.2. Protection from detrimental conduct

Detrimental treatment includes (actual or threatened) dismissal, demotion, harassment, discrimination, disciplinary action, bias, damage to a person's reputation, damage to a person's business or financial position or any other damage to a person.

If you are subject to actual or threatened detriment (defined below) because you made a disclosure under this Standard, you should raise this as a concern to a Whistleblower Protection Officer or Stopline (see paragraph 4 above). Actual detriment occurs when:

- (a) you (or another person) are subjected to actual detriment by another person;
- (b) because that other person believes or suspected that you, or any other person, made, may have made, proposes to make or could make a disclosure under this Standard; and
- (c) that person's belief or suspicion is the reason, or part of the reason, for the person's conduct.

Threatened detriment occurs when:

- (a) another person threatens to cause you (or another person) detriment;
- (b) that person intends you to fear that their threat will be carried out, or is reckless as to whether you fear that their threat will be carried out; and
- (c) that person makes the threat because you made (or may make) a disclosure under this Standard.

All persons must not engage in any detrimental conduct in relation to anyone who may make or may have made a disclosure under this Standard. Aurelia will take disciplinary action, which may include dismissal, against any person who has a substantiated instance of such conduct.

The following is not considered to be detrimental conduct:

- (a) administrative action that is reasonable for the purpose of protecting you from detriment; or
- (b) managing your unsatisfactory work performance, if the action is in accordance with Aurelia's Disciplinary and/or Performance & Salary Review Procedure.

Aurelia takes these obligations seriously. Aurelia will protect you from detriment by:

- (a) undertaking an assessment of the risk of detriment against you and other persons, as soon as practicable after receiving a disclosure;
- (b) advising you of your ability to access Aurelia's Employee Assistance Program (see paragraph 16 for details);
- (c) considering any actions necessary, including for example, performance of duties from another location, temporary reassignment of staff, other modifications to the workplace or the way duties are performed; and
- (d) ensuring management are aware of their responsibilities under this Standard.



## 6.3. Compensation and remedies

You may be able to seek compensation and other remedies through the courts in the event it is established that:

- (a) you suffer loss, damage or injury because of your disclosure; and
- (b) an Aurelia Company failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

You should seek independent legal advice if you wish to seek compensation or other remedies.

## 6.4. Protection against legal action

If you make a disclosure that qualifies for protection under this Standard:

- (a) you are not subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure; and
- (b) no contractual or other remedy may be enforced, and no contractual or other right may be exercised against you on the basis of the disclosure.

However, this does not prevent you from being liable for other conduct (or misconduct) by you that is revealed by your disclosure.

# 7. Anonymous disclosure

You may choose to be anonymous when you make a disclosure, over the course of any investigation and after the investigation is finalised, and the protections under this Standard will apply to you.

However, Aurelia encourages you to share your identity wherever possible as this will make it easier to fully investigate the disclosure and to provide you with the support and protections described in this Standard.

If you do disclose your identity, you may also advise that you wish to place restrictions on who knows your identity. Aurelia will comply with this request and make best endeavours to investigate the disclosure. However, there may be limitations in investigating a disclosure where you do not consent to disclosure of your identity.

If you wish to remain anonymous, Aurelia will:

- (a) communicate with you through a channel you advise, including an anonymous telephone number or email address; and
- (b) if you wish, adopt a pseudonym for the purpose of the disclosure (for example in cases where your identity is known to the recipient, but you do not wish your identity to be known to anyone else).

If you wish to remain anonymous and do not provide any contact details, then you are encouraged to remain in contact with Aurelia (for example following up by email or telephoning Stopleveline to check on any updates) so that ongoing two-way communication can be maintained (and Aurelia can ask any follow-up questions or provide you with feedback).

# 8. What happens after I make my disclosure?

Our Whistleblower Protection Officers are responsible for receiving, forwarding and acting upon disclosures made under this Standard. If you make your disclosure to Stopleveline, that information will be forwarded to the Whistleblower Protection Officers.

A disclosure will be acknowledged by the Whistleblower Protection Officer within a reasonable period after the disclosure is received, if you have provided contact details. The Whistleblower Protection Officer will contact you (by phone if you have provided those details) to obtain any additional information relevant to your disclosure.

The Whistleblower Protection Officer will need to assess your disclosure to determine whether:

- (a) it qualifies for protection under this Standard; and
- (b) a formal in-depth investigation is required (see paragraph 9 below).

The Whistleblower Protection Officer will discuss with you:

- (a) the protections available to you under this Standard regarding the disclosure of your identity; and
- (b) whether you consent to your identity being disclosed to a limited number of individuals to assist with the conduct of the investigation, and/or to provide you with support during the investigation.

If you make an anonymous disclosure and do not provide any contact details, the Whistleblower Protection Officer will assess your disclosure in accordance with the provisions below.

## 9. How will my disclosure be investigated?

- (a) A disclosure of Reportable Conduct will be assessed by the Whistleblower Protection Officer as to whether further investigation is appropriate. In order to determine this, the Whistleblower Protection Officer may require further information from you or may gather further information from other people based on your disclosure.
- (b) If it is determined that there is insufficient information or evidence to warrant further investigation, you will be informed at the earliest possible opportunity (except where the disclosure has been made on an anonymous basis) and no further action will be taken.
- (c) If there is a sufficient prima facie case based on the material you have disclosed and/or any further information obtained by the Whistleblower Protection Officer, your disclosure will then be referred to a designated Whistleblower Investigation Officer for investigation. The Whistleblower Investigation Officer may either be someone internal (i.e. an Aurelia employee) or an external investigator. The Whistleblower Protection Officer will determine the best course of action, having regard to the nature of your disclosure and the individuals involved. Any Whistleblower Investigation Officer will be independent of you, any person who is the subject of the Reportable Conduct and the business unit in respect of which allegation has been made. Depending on your instructions, the Whistleblower Investigation Officer may not be told your identity. Aurelia will advise the Whistleblower Investigation Officer of the degree to which (if at all) you consent to your identity being disclosed in the course of the investigation.
- (d) You will be informed of the Whistleblower Investigation Officer's appointment.
- (e) The Whistleblower Investigation Officer will conduct an investigation that is objective, fair, independent, thorough, confidential and without bias. The Whistleblower Investigation Officer will interview you (if you have consented to your identity being disclosed to them); all relevant witnesses; and the individuals that are the subject of, or are named in, your disclosure (though not necessarily in that order).
- (f) If you have not consented to your identity being revealed during the course of the investigation, the Whistleblower Investigation Officer will not disclose your identity to anyone involved in the investigation. However, please refer further to paragraph 6.1 in relation to the necessity to provide information in an investigation that is likely to reveal your identity.
- (g) Once the Whistleblower Investigation Officer has made all the necessary enquiries, the Whistleblower Investigation Officer will prepare a report that summarises the evidence and their findings regarding each allegation. If you have not consented to your identity being disclosed in the course of the investigation, your name will not be referred to in the report.
- (h) The timeframes for undertaking the investigation and preparing the report will depend on the nature of the report. You will be provided with updates, the frequency of which may depend on the investigation, if you can be contacted.
- (i) The Whistleblower Investigation Officer's report (subject to preserving your confidentiality) will be provided to the Board (excluding any Board member who may be the subject of the report). Where an investigation substantiates an allegation arising from the disclosure of Reportable Conduct, the matter

will be dealt with in accordance with Aurelia's established procedures, which may result in disciplinary action, including termination of employment or engagement and matters may be referred to external parties where appropriate (e.g. in matters that may involve criminal behaviour).

- (j) You will be informed by the Whistleblower Investigation Officer of the outcome of the investigation, where and to the extent appropriate and possible.

## 10. Requirement for confidentiality in investigations

Anyone involved in an investigation is required to preserve confidentiality in relation to the investigation. The Whistleblower Investigation Officer will explain this obligation further to those parties involved. Failure to comply with these confidentiality obligations could result in disciplinary action, up to and including the termination of employment.

All files and records created from an investigation will be retained under strict security and confidentiality. Unauthorised release of information to someone not involved in the investigation will be a breach of this Standard.

## 11. Fair treatment

Aurelia will ensure fair treatment of employees who are mentioned in a disclosure that qualifies for protection under this Standard, including those who are the subject of a disclosure. This includes:

- by ensuring disclosures are handled confidentially, when it is practical and appropriate in the circumstances;
- the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the disclosure;
- if an investigation is undertaken it will be objective, fair and independent;
- an employee the subject of a disclosure will be:
  - advised about the subject matter of the disclosure as and when required according to the principles of natural justice and procedural fairness and prior to any action being undertaken – e.g. if the disclosure will be the subject of an investigation;
  - given a reasonable opportunity to put their case to the Whistleblower Investigation Officer, if any investigation is conducted; and
  - informed of the outcome of the investigation to the extent relevant to the employee (but will not be given a copy of the investigation report); and
- you and any employee the subject of the disclosure can contact Aurelia's Employee Assistance Program (see paragraph 16 for details).

## 12. Reporting, monitoring and reviews of investigations

A summary of the number and type of instances of Reportable Conduct raised under this Standard will be provided to the Board at each board meeting on a 'no names' basis. Any report prepared by a Whistleblower Investigation Officer will also be provided to the Board (excluding any Board member who may be the subject of the report), subject to confidentiality being preserved.

If a person who makes a disclosure of Reportable Conduct considers that their disclosure has not been dealt with in accordance with this Standard, the matter should be escalated to a Whistleblower Protection Officer in the first instance or otherwise to the Sustainability and Risk Committee through the Company Secretary.

## 13. Other persons and organisations who you can make a disclosure to

Nothing in this Standard restricts you from disclosing a concern to which this Standard applies to:

- (a) ASIC or APRA;
- (b) a legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
- (c) Aurelia's internal or external auditor (including a member of the audit team conducting an audit of the financial statements of Aurelia).

However, Aurelia encourages disclosure to a Whistleblower Protection Officer or Stopline at first instance.

## 14. False disclosures

Aurelia will treat all disclosures of Reportable Conduct seriously and will ensure that if you raise concerns in accordance with this Standard you will have the benefit of the protections afforded by this Standard. However, deliberate false reporting will not be tolerated.

False disclosures could have significant effects on the reputation of Aurelia and the personal reputations of other people and may also lead to a significant waste of time and effort.

Any person found to have made a deliberate false disclosure will be subject to disciplinary action.

## 15. Public interest and emergency disclosures

In limited circumstances, you may qualify for protection as a whistleblower under the Corporations Act if you make a public interest or emergency disclosure to a member of Parliament or a journalist.

The protections will apply only if you first meet a series of strict conditions, including that a disclosure must have previously been made to ASIC, APRA or a prescribed body (90 days must have passed for a public interest disclosure) and written notice to the body to which disclosure was made has been given prior to the public interest or emergency disclosure. It is important that you understand the criteria for making a public interest or emergency disclosure. It is recommended that you obtain independent legal advice if you are considering making a public interest or emergency disclosure.

If you make a public interest or emergency disclosure that qualifies for protection under the Corporations Act:

- (a) to the extent relevant, the confidentiality provisions of this Standard will be applied; and
- (b) the provisions relating to detrimental conduct (i.e. victimisation) and paragraph 11 (fair treatment) of this Standard will apply.

## 16. Additional support available to employees involved in the process

Aurelia will provide training to employees in respect of their rights and obligations under this Standard and to those who may receive disclosures made under this Standard on how to handle those disclosures.

You are reminded that Aurelia's Employee Assistance Program is available to all employees and their family members. The phone number for Aurelia's Employee Assistance Program provider, Drake WellbeingHub, is 1300 135 600.

## 17. About this Standard

This Standard is available on Aurelia's website ([www.aureliametals.com.au](http://www.aureliametals.com.au)). A copy may also be obtained from a Whistleblower Protection Officer.

## 18. Standard status and review

The Board will review this Standard at least once every two years to ensure it remains effective and meets the requirements of Aurelia. This Standard is not a term or condition of any contract, including any employment contract.

This Standard has been approved by the Board and is current as at 17 June 2022 and has been updated as per the table below.

Revision	Date	Change description
1	1 July 2020	New Standard
2	17 June 2022	Review and update to existing Standard
3	23 February 2023	Update to Whistleblower Protection Officer contact details