



**Globe**  
Metals & Mining

# Whistleblower Policy

September 2023

## 1. INTRODUCTION

- (a) Globe is committed to conducting its global business activities with integrity and supporting an internal culture of honest, ethical, and socially responsible behaviour.
- (b) To ensure these objectives are achieved, Globe encourages the reporting of any actual or suspected instances of illegal, unethical, fraudulent, or undesirable conduct involving the Group, Globe Personnel, and/or Contractor Parties.
- (c) Globe's internal controls are intended to prevent, deter, and remedy any violation of applicable laws and regulations. However, even the best systems of control and procedures cannot provide absolute safeguards against such violations. To that end, Globe recognises that an effective whistleblower policy:
  - (i) is a critical component to reinforce a strong commitment to, and compliance with, relevant legal and ethical obligations;
  - (ii) enables individuals to feel that Globe is properly addressing their concerns; and
  - (iii) does not penalise individuals for fulfilling their obligation to ensure that Globe's conduct meets its policies on compliance and ethics.
- (d) However, it is important to note that this Policy has been implemented to assist with protecting bona fide whistleblowers and should not be used for any other objective (for example, a personal difference of opinion, a report which has not been made in good faith, a personality clash, or to simply undermine another person's position in the Group).
- (e) The purpose of this Policy is to encourage the persons to whom this Policy applies to raise any concerns or report instances of any potential breach of law, any violations (or suspected violations) of Globe's Code of Conduct, or any other legal or ethical concern without fear of Detriment.
- (f) This Policy should be read together with Globe's Code of Conduct and other policies. If there is any inconsistency between this Policy and Globe's Code of Conduct or other policies, then this Policy prevails to the extent of the inconsistency.
- (g) This Policy applies to the Group and all Globe Personnel and Contractor Parties.

## 2. DEFINITIONS

In this Policy, unless the context otherwise requires:

**ASIC** means the Australian Securities & Investments Commission.

**Board** means the board of Directors as constituted from time to time.

**Chairperson** means the chairperson of the Board from time to time.

**Company Secretary** means the company secretary of Globe from time to time.

**Contractor Parties** means all contractors, agents, consultants, joint venture partners, and other authorised representatives of the Group under a relevant contractual obligation.

**Corporations Act** means the *Corporations Act 2001* (Cth).

**Detriment** means, without limitation, dismissal of an employee, injury of an employee in their employment, alteration of an employee's position or duties to their disadvantage, discrimination between employees, harassment or intimidation of a person, harm, or injury to a person (including psychological harm), damage to a person's property, reputation, or business or financial position, and any other damage to a person.

**Directors** means the directors of Globe from time to time and **Director** means any one of them.

**Globe** means Globe Metals & Mining Limited (ABN 33 114 400 609).

**Globe Personnel** means all directors, officers, and employees of the Group.

**Group** means Globe and its controlled entities.

**Policy** means this Whistleblower Policy as amended and adopted by the Board from time to time.

**Reportable Conduct** means any conduct described in clause 3 of this Policy.

**TAA** means the *Taxation Administration Act 1953* (Cth).

**Third Parties** means all service providers, suppliers, and third-party contractors to the Group.

**Whistleblower** means any Globe Personnel, Contractor Party, or Third Party who makes an allegation of Reportable Conduct under this Policy.

### **3. REPORTABLE CONDUCT**

A Whistleblower may make an allegation under this Policy if they have reasonable grounds to suspect that any Globe Personnel or Contractor Party has engaged in conduct which is:

- (a) a breach of Globe's Code of Conduct or other policies;
- (b) dishonest, fraudulent, or corrupt;
- (c) illegal (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- (d) unethical or in breach of applicable laws;

- (e) conduct that constitutes harassment, discrimination, victimisation, or bullying;
- (f) conduct that is potentially damaging to the Group, Globe Personnel, or Third Parties such as unsafe work practices, environmental damage, health risks, or abuse of Globe's property or resources;
- (g) conduct which may cause financial or non-financial loss to Globe or otherwise be detrimental to the interests of Globe; or
- (h) any other misconduct or improper state of affairs or circumstances in relation to Globe.

#### **4. WHISTLEBLOWER OFFICER**

- (a) The Board will appoint the Company Secretary to the position of "Whistleblower Officer".
- (b) The Whistleblower Officer's role will be to investigate the substance of any allegation of Reportable Conduct to determine whether or not there is evidence to substantiate the existence of actual Reportable Conduct.
- (c) The Whistleblower Officer has direct, unfettered access to independent financial, legal, and operational advice as required for the purposes of effectively carrying out the role. The Whistleblower Officer also has a direct reporting line to the Chairperson.
- (d) If an allegation of Reportable Conduct relates to the Company Secretary, the matter should be referred to the Chairperson.

#### **5. MAKING A REPORT**

- (a) If a Whistleblower becomes aware of any matter that they consider to be Reportable Conduct, they can:
  - (i) report the matter to their direct supervisor or manager. However, if a Whistleblower is not comfortable speaking to their supervisor or manager, or is not satisfied with the response to the report, the Whistleblower is encouraged to speak to anyone in management who they are comfortable speaking to;
  - (ii) report directly to the Whistleblower Officer; or
  - (iii) if the matter concerns the Whistleblower Officer, or a Whistleblower is not comfortable contacting the Whistleblower Officer, they should contact the Chairperson.
- (b) Whistleblowers should provide in the report all the information on which they formed the view that they had reasonable grounds to suspect Reportable Conduct to assist in the investigation of the conduct. For example, information in the report could include

the date, time, and location of the conduct, the name(s) of the persons involved and any witnesses to the events, evidence of the events (ie, emails or documents) and any steps the Whistleblower or another person may have already taken to report or resolve the matter.

- (c) Reports under this Policy may be submitted verbally or in writing.
- (d) Nothing in this Policy restricts a person from reporting any matter or providing any information to a regulator (for example, ASIC), Globe's auditor or a member of the audit team, or any other person in accordance with any relevant law, regulation, or other requirement.
- (e) A false report of Reportable Conduct may have a significant impact on Globe's reputation or the reputation of Globe Personnel and may result in a considerable waste of time and effort. Any deliberately false reporting of Reportable Conduct will be treated as a serious disciplinary matter.

## **6. INVESTIGATION PROCEDURE**

- (a) The Whistleblower Officer will investigate all matters reported under this Policy as soon as possible after the matter has been reported. A Whistleblower Officer may appoint a person to assist in the investigation of a matter raised in a report. Where appropriate, Globe will provide feedback to the Whistleblower regarding the progress and/or outcome of the investigation (subject to considerations of the privacy of those against whom allegations are made).
- (b) The investigation will be conducted in an objective and fair manner and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and relevant circumstances.
- (c) The person who has had a report of Reportable Conduct made against them will be informed and given the opportunity to respond to the report and will be presumed innocent until proven otherwise. Their defence will be fairly set out in any report arising from the investigation and they will be kept informed of the progress of the investigation and the outcome as is reasonable and appropriate having regard to the nature of the Reportable Conduct and any legal considerations.
- (d) If the report is not submitted anonymously, a Whistleblower may be contacted to discuss the investigation process. However, if a report is submitted anonymously, the investigation will be conducted based on the information provided by the Whistleblower in their report.

## **7. PROTECTION OF WHISTLEBLOWERS**

### **7.1 No Detriment**

- (a) Globe is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report are treated fairly and do not suffer any Detriment.
- (b) A Whistleblower who makes a report of Reportable Conduct will not suffer Detriment by having made the report.
- (c) If Detriment is suffered, or claimed to have been suffered, by a Whistleblower, the Whistleblower should immediately report this to the Whistleblower Officer. If the matter is not remedied, then it should be reported to the Chairperson.

### **7.2 Confidentiality and Privacy**

- (a) Subject to compliance with legal requirements and clause 7.2(b), upon receiving a report under this Policy, Globe will not, nor will any supervisor, manager, or Whistleblower Officer, disclose the Whistleblower's identity or any other information that is likely to lead to the identification of the Whistleblower's identity unless:
  - (i) the Whistleblower consents; or
  - (ii) the disclosure is made to ASIC, the Australian Prudential Regulation Authority, or a member of the Australian Federal Police, or a legal practitioner for the purposes of obtaining legal advice or legal representation.
- (b) If Globe needs to investigate a matter it may disclose information that may be likely to lead to the identification of a Whistleblower provided that the disclosure is not of the identity of the Whistleblower, the disclosure of the information is reasonably necessary for the purposes of investigating the matter, and Globe takes all reasonable steps to reduce the risk that the Whistleblower will be identified as a result of the disclosure.
- (c) Globe will also ensure that any records relating to a report of Reportable Conduct are stored securely and are able to be accessed only by authorised staff.
- (d) Unauthorised disclosure of:
  - (i) the identity of a Whistleblower; or
  - (ii) information that is likely to lead to the identification of a Whistleblower,will be a breach of this Policy and the offender will be subject to disciplinary action, which may include termination.

### **7.3 Special Protections**

The Corporations Act and the TAA provide special protections to disclosures about breaches of those Acts subject to certain conditions being met. To the maximum extent permitted by law, the special protections under those Acts will apply to Whistleblowers as if set out in this Policy in full.

### **8. WELFARE MONITORING**

- (a) Globe acknowledges that both Whistleblowers and persons against whom allegations of Reportable Conduct have been made may suffer stress and emotional reactions.
- (b) Globe will take reasonable steps to maintain processes to monitor the welfare of both Whistleblowers and persons against whom allegations of Reportable Conduct have been made.

### **9. MORE INFORMATION**

Globe Personnel who have queries about this Policy should contact the Company Secretary.

### **10. POLICY REVIEW**

This Policy is to be reviewed by the Board on a periodic basis.