

## WHISTLEBLOER POLICY STATEMENT

The Company and its subsidiaries (together the “Group”) encourages a culture within it of ‘speaking up’ to raise concerns about possible unlawful, unethical or socially irresponsible behaviour or other improprieties of or within the Group without fear of retaliation or otherwise being disadvantaged.

### 1. GENERAL

This policy encourages reporting of such matters and provides effective protection from victimisation or dismissal to those reporting by implementing systems for confidentiality and report handling.

This policy applies equally to all directors, employees, consultants and officers of the Group and other stakeholders, including shareholders, suppliers, or members of the public, and family members of the foregoing (**Relevant Persons**).

### 2. TYPES OF REPORTABLE CONDUCT

The Group is committed to establishing and maintaining a culture of good governance and corporate compliance with legal and ethical behaviour generally.

This includes the ability for people within and outside of the Group being able to come forward with complaints if they consider, with reasonable grounds of suspicion, that:

- (a) the Group and/ or a Relevant Person is not acting lawfully, ethically or in a socially responsible manner in relation to the Group’s affairs; or
- (b) there is a breach or potential breach of the Company’s Code of Conduct or other Corporate Governance Policies of the Company; or
- (c) any other behaviour of or within the Group which is considered dishonest, fraudulent, corrupt, illegal, unethical, other serious improper conduct or an unsafe work practice,

(Reportable Conduct).

### 3. REPORTING REPORTABLE CONDUCT

Where a Relevant Person (**Reporting Person**) is concerned about potential Reportable Conduct they may report the matter to the Report and Investigation Officer (**RIO**). The current RIO is as follows:

Name: Fiona Van Maanen  
Position: CFO and Company Secretary  
Tel: +61 8 9220 5700  
Email: fiona.vanmaanen@metalsx.com.au

Any Reporting Person must have objectively reasonable grounds for suspecting Reportable Conduct. It is a serious disciplinary offence to make allegations that prove to be unsubstantiated and made maliciously or known to be false.

If any person is not comfortable speaking with the RIO on a particular matter or if they are unavailable and the matter is urgent, they should contact a member of the board of directors of the Company (**Board**) or another member of management personnel within the Group, who shall undertake the RIO’s responsibilities under this policy in relation to the matter to the extent of their capabilities.

## 4. REPORT AND INVESTIGATION OFFER

The RIO is responsible within the Group for investigation and resolving all reported complaints and allegations concerning Reportable Conduct.

At their discretion, the RIO shall advise the Chairman and/ or Executive Director/Managing Director/Chief Executive Officer of the Company of the Reportable Conduct having consideration to any anonymity wishes of the Reporting Person and the circumstances of the Reportable Conduct.

The RIO is provided direct access to the Board or any relevant sub-committee charged with overseeing this policy (either being the **Overseeing Committee** as determined by the Board).

## 5. HANDLING OF REPORTED VIOLATIONS

The RIO will notify the Reporting Person to acknowledge receipt of their report within five (5) business days. All reports will be promptly investigated and, if warranted, appropriate corrective action will be taken.

The Company will investigate and/or take action to address all matters reported under this policy. Investigations will be conducted in an objective and fair manner, in line with the Company's values and procedures. Where appropriate, feedback will be provided to the Relevant Person regarding the investigation's progress and/or outcome.

## 6. CONFIDENTIALITY

Reports of potential Reportable Conduct will be kept confidential and may only be disclosed to ASIC, APRA, a member of the Australian Federal Police or to someone else with the consent of the Reporting Person to the extent possible, consistent with the need to conduct an adequate investigation.

## 7. ANONYMITY

There is no obligation for a Reporting Person to reveal their identity and they may request that their identity remain confidential and known only to the RIO and/ or other person to whom the Reportable Conduct is reported.

If the Reporting Person reports anonymously, the RIO or other person to whom Reportable Conduct was reported, is required to preserve that person's anonymity and will not disclose their identity except with the Relevant Persons consent.

## 8. ADDITIONAL PROTECTIONS

In addition to protections under this policy, a Reporting Person may have additional protections under Part 9.4AAA of the Corporations Act.

## 9. ANONYMITY MAY IMPEDE INVESTIGATION

It is important for Reporting Persons to understand that in some situations, if they choose for their identity to remain anonymous this can limit or prevent the Company's ability to effectively investigate the matter or to take appropriate action. If this is the case, the Relevant Person will be contacted to discuss the matter further and explain the limitations caused and protections that can be provided, so that the Reporting Person can make an informed choice about whether to remain anonymous.

## 10. AUDITING MATTERS / RETENTION OF RECORDS

The Overseeing Committee will have an audit or review of the policy and related procedures to check if reports of Reportable Conduct were appropriately recorded, investigated and responded to and whether any changes are required to this policy.

The Overseeing Committee shall retain all records relating to any concern or report of Reportable Conduct of a retaliatory act and to the investigation of any such report for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained shall include records of all steps taken in connection with the investigation and the results of any such investigation.

## 11. TRAINING

The Group will provide for the training of employees about this policy and their rights and obligations under it.

The Group will provide for the training of managers and others who may receive reports of Reportable Conduct about how to respond to them.

## 12. NO RETALIATION

A Reporting Person will not be personally disadvantaged by having made a report. This includes not being disadvantaged by way of dismissal, demotion, any form of harassment, discrimination or current or future bias.

No current or former Relevant Person or their family members, who reports Reportable Conduct this policy shall suffer detriment, either actual or threatened, harassment, retaliation or adverse employment or engagement consequence.

If someone engaged by a Group member retaliates against a Reporting Person, the first mentioned person may be subject to discipline in the Board's discretion depending on the severity of the conduct, which may include termination of employment or services.

All Relevant Persons are requested to report to the RIO any retaliation or victimisation of a person that reports Reportable Conduct.

## 13. WEBSITE

This policy will be available for review on the Company's website.