External Whistleblower Policy

1. Purpose

Adamantem is committed to fostering a culture of good corporate governance and ethical behaviour. This policy sets out the Adamantem's approach to managing disclosures by whistleblowers. It is a key part of our risk management and corporate governance framework.

This policy aims to:

- ensure that individuals who make a "protected disclosure" can do so safely, securely and with confidence that they will be protected; and
- ensure that there is a transparent process around receiving, handling and investigating disclosures; and
- encourage a culture of compliance with our legal and ethical obligations.

2. Scope

Under the whistleblower protection legislation, an eligible whistleblower can be someone who is or was:

- an officer or employee of the Company
- a relative, dependant or spouses of current employees of the Company
- an individual or an employee of a person that supplies services or goods to the entity
- an individual who is an associate of the entity.

In this policy "Company" means Adamantem. This policy applies to disclosures made to Stopline in relation to matters within Part 9.4AAA (protection for whistleblowers) of the Australian *Corporations Act 2001*.For the purposes of this policy, a 'protected disclosure' occurs when an eligible whistleblower, has reasonable grounds to suspect there has been misconduct or an improper state of affairs or circumstances in relation to the Company (disclosable conduct) and discloses that suspicion to an 'eligible recipient' of the Company.

3. Overview

It is critical that people who become aware of possible illegal or unethical conduct are able to disclose their suspicions to an appropriate person with the knowledge that their disclosures will be investigated properly and that they will not suffer negative consequences as a result of making a disclosure. It is equally important that potential wrongdoers know that others are encouraged to report their wrongdoing.

The *Corporations Act 2001* requires that companies such as ours (and our related entities) have appropriate whistleblower policies and systems in place for receiving, investigating and acting on certain disclosures made by an "eligible whistleblower" to a relevant person (called '**protected disclosures**' in this policy). The *Taxation Administration Act 1953* also contains similar whistleblower protections. This policy covers the types of disclosures protected by these Acts.

4. Disclosable conduct definition

Any matter that a person reasonably believes breaches the Company's policies, or the law should be reported in accordance with this policy.

Examples of disclosable conduct can include:

- breaches of laws or regulations;
- unlawful, corrupt or irregular activities or practices or use of The Company's funds or property;
- illegal activities (including theft, drug sales/use, violence or threatened violence and criminal conduct);
- breaches of the Company's policies and procedures (including but not limited to the Code of Conduct);
- conduct that causes a substantial risk to public health, public safety or the environment;
- dishonest or unethical behaviour;
- financial fraud or mismanagement;
- other conduct likely to damage the Company's financial position or reputation;
- conduct that endangers the public or financial system;
- behaviour that is oppressive, discriminatory or grossly negligent;
- conduct or proposed conduct suspected to be in breach of the *Competition and Consumer Act 2010*, *Corporations Act 2001* or the *Australian Securities and Investments Commission Act 2001*;
- instances of modern slavery or other human rights issues
- concealing misconduct or an improper state of affairs.

5. Reporting Procedure

Adamantem's eligible recipients include internal Whistleblower Protection Officers (WPO's) who are comprised on a panel of senior staff.

E: WPO@adamantem.com.au

And our external whistleblower service provider: Stopline:

Ph: 1300 30 45 50
E: makeareport@stopline.com.au
W: http://adamantem.stoplinereport.com/

Upon receiving a disclosure made by an eligible whistleblower, the WPO will, as soon as possible, assess all matters notified to them under this policy and:

- will determine whether it is a disclosure under the whistleblower provisions of the Corporations Act

- determine the appropriate course of action to resolve the matters raised in the disclosure (which may or may not include an investigation)
- take all reasonable steps to ensure the whistleblower's identity is kept confidential, subject to consent and permissions given by the whistleblower;
- determine if the disclosure is a protected disclosure, or whether it is more appropriate managed under another policy or procedure;
- determine if the matter should be investigated, and by whom; and
- assess the risk of any detrimental conduct to the whistleblower, or any other person, because the disclosure has been made.

6. Qualifications for Whistleblower Disclosure

In order for a report to qualify as a whistleblower disclosure which is covered by whistleblower protections, it needs to satisfy four elements:

1. Made by an eligible whistleblower
2. To an eligible recipient
3. On Reasonable Grounds
4. About reportable conduct

False or vexatious complaints are not qualifying disclosures and can carry penalties under the Corporations Act.

7. Protections and support for whistleblowers

The Company is committed to the protection of eligible whistleblowers who make a protected disclosure.

Other than as required by law and set out in this policy, the Company will not disclose the identity of whistleblowers without the whistleblower's consent to that disclosure. Australian law prohibits the disclosure of a whistleblower's identity other than as required to investigate the allegation or with the free consent of the whistleblower. All protected disclosure reports from whistleblowers will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors.

The Company is committed to doing what it reasonably can to protect eligible whistleblowers who make a protected disclosure from reprisal or victimisation.

Reports of victimisation can also be reported via Stopline and its various reporting channels.

The *Australian Corporations Act 2001* also provides specific protections for eligible whistleblowers relating to:

- identity protection (confidentiality)
- protection from detrimental acts or omissions;
- compensation and remedies; and
- civil, criminal and administrative liability protection.

See below for links to guidance material from the Australian Securities and Investments Commission (ASIC) and more information about these protections.

https://www.asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-rights-and-protections/

Specific protections are also provided under Australian tax laws (see the below link to information provided by the Australian Taxation Office).

https://www.ato.gov.au/about-ato/whistleblowers

8. Handling and investigation of disclosures

If a report is made to our Whistleblower Protection Officer (WPO) through Stopline, the WPO will determine if a disclosure qualifies for protection, and the most appropriate course of action to deal with the complaint.

Disclosures raised will be received and treated seriously and with the utmost sensitivity. Whilst making a disclosure doesn't guarantee a matter will be formally investigated, all disclosures will be reviewed and based on the nature of the disclosure and evidence provided. From here a decision will be made as to whether the disclosure warrants an investigation.

Disclosers have the option to make anonymous disclosures. However, it is important to note that there may be limitations in our ability to thoroughly investigate anonymous matters. Additionally, we may face challenges in providing updates or informing the discloser of the outcomes of their disclosure. We encourage disclosers to provide contact information to facilitate effective communication and resolution of the matter. Where appropriate, disclosers will be provided with updates and/or outcomes of disclosures referred for investigation