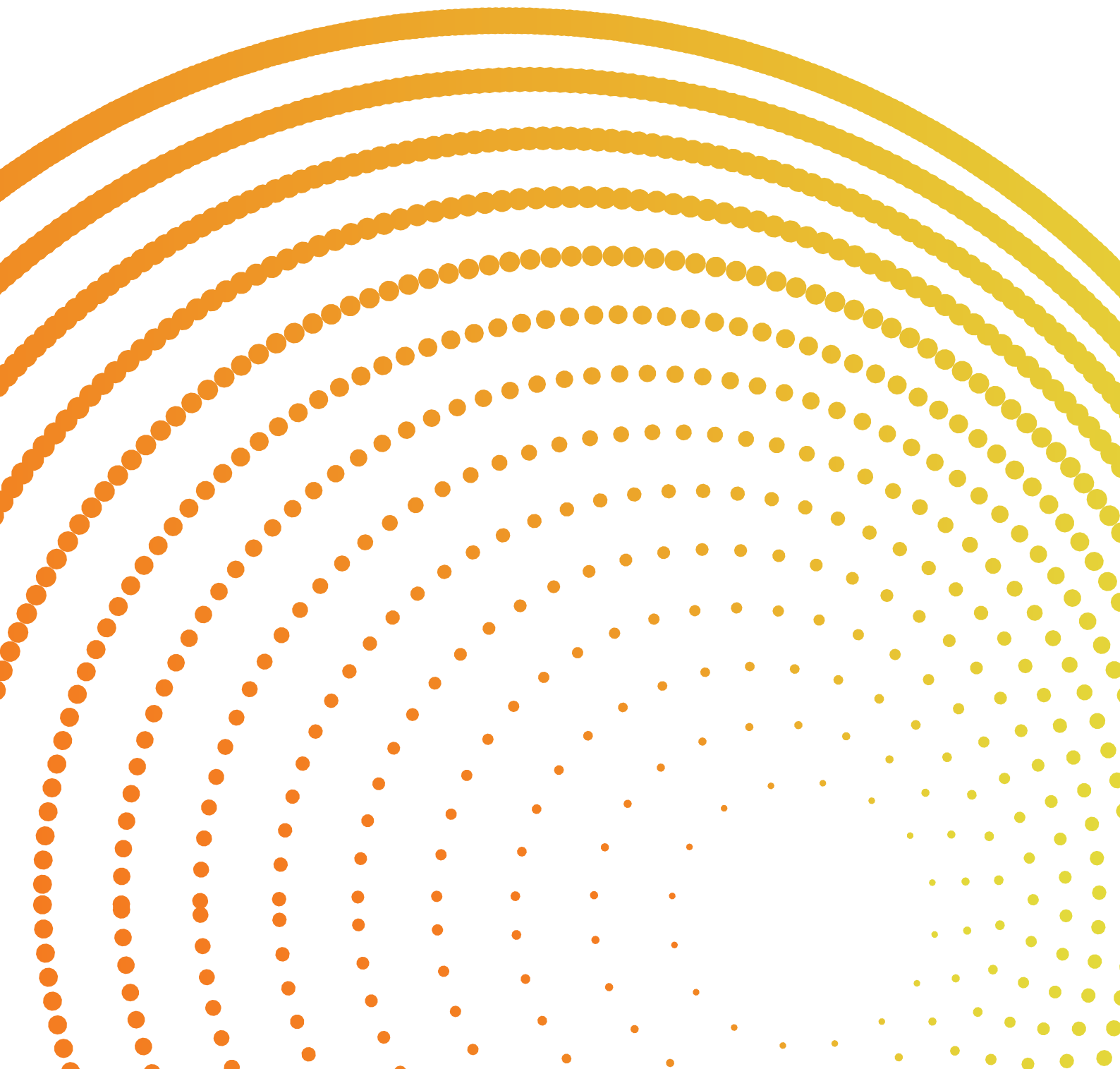

Whistleblower Policy 2022

MOLYCOP

Molycop Legal



Whistleblower Policy

In this Whistleblower Policy (**this Policy**), Molycop means any company or business within the Molycop group of companies and businesses, including any other companies and businesses that may be acquired by or form part of the Molycop group from time to time.

Molycop is committed to high standards of conduct in all of its business activities, and to promoting and supporting a culture of honest and ethical behaviour, compliance and good corporate governance.

Molycop encourages any person who becomes aware of any Reportable Conduct to raise those concerns in accordance with this Policy.

Molycop will make this policy available:

- to all existing officers, employees
- to all new officers, employees as part of the onboarding process
- to all contractors
- on Molycop's external website.

1.0 When should a report be made?

If you become aware of any information or circumstances that you have reasonable grounds to suspect involve misconduct or an improper state of affairs in relation to Molycop, you should raise your concerns promptly.

Conduct you should report ("Reportable Conduct") includes potential or actual:

- corruption (e.g. bribes)
- fraudulent behaviour (e.g. falsifying documents)
- illegal activity (e.g. theft, violence)
- breach of any law, regulation, internal policy or code
- endangerment to the health and safety of others or potential damage to the environment
- inappropriate workplace behaviour (e.g. bullying, harassment and discrimination) maladministration (e.g. unjust, based on improper motives, unreasonable, oppressive or negligent)
- actions that may cause financial or non-financial loss to Molycop or be otherwise detrimental to the interests of Molycop, or
- concealment of any Reportable Conduct.

If you become aware of Reportable Conduct, you should immediately report it to any of the following:

- an officer or senior manager of Molycop
- an auditor or member of an audit team appointed by Molycop to conduct an audit
- General Manager/country President of the affected business
- Finance Manager of the affected business
- Regional President of the affected business
- Chief Human Resources Officer
- Chief Legal Officer
- Molycop independent and anonymous toll free hotlines or email addresses (see page 3)

Molycop independent and anonymous toll free hotlines or email addresses:

Australia – SpeakUp (operated by InTouch)

- Phone number: 1-800-823-141
- Email: molycopspeakup@getintouch.com

Canada – SpeakUp (operated by InTouch)

- Phone number: 1 877 767 1333 (Maple Leaf Metals: 1 866 907 7412)
- Email: molycopspeakup@getintouch.com

Chile – SpeakUp (operated by InTouch)

- Phone number: 1230 020 0179
- Email: molycopspeakup@getintouch.com

Singapore – SpeakUp (operated by InTouch)

- Phone number: 800-852-3421
- Email: molycopspeakup@getintouch.com

Indonesia – SpeakUp (operated by InTouch)

- Phone number: 001 803 015 203 9789
- Email: molycopspeakup@getintouch.com

Mexico – SpeakUp (operated by InTouch)

- Phone number: 001 866 869 4655
- Email: molycopspeakup@getintouch.com

Peru – SpeakUp (operated by InTouch)

- Phone number: 0800 52 288
- Email: molycopspeakup@getintouch.com

Russia – SpeakUp (operated by InTouch)

- Email: molycopspeakup@getintouch.com

Spain – SpeakUp (operated by InTouch)

- Phone number: +34-902018502
- Email: molycopspeakup@getintouch.com

US – SpeakUp (operated by InTouch)

- Phone number: 1 877 344 2748
- Email: molycopspeakup@getintouch.com

Reports can be made anonymously.

If you are unsure whether conduct would be considered Reportable Conduct under the Policy, you should discuss your concerns on an informal basis with one of the people mentioned above.

2.0 Investigation

Molycop will investigate all cases of Reportable Conduct in a timely, confidential, objective and fair manner. Molycop will do everything reasonably possible to ensure the details of any person who reports Reportable Conduct and any details of the Reportable Conduct that may identify them will remain confidential and will not be disclosed unless required by law.

3.0 Whistleblower Protection

The following persons are afforded protection under this Policy when disclosing Reportable Conduct:

- an officer of Molycop
- an employee of Molycop
- an individual who supplies goods or services to Molycop (whether paid or unpaid)
- an employee of a person who supplies goods or services to Molycop (whether paid or unpaid)
- an individual who is an associate of Molycop, and
- a relative or dependent of any individual listed in the 5 preceding dot points.

If any of the above listed people report Reportable Conduct in accordance with this Policy, they will not be subjected to any damage arising from reprisal due to that report, including:

- if the person is a Molycop employee:
 - dismissal
 - injury in his or her employment with Molycop
 - alteration of duties to his or her disadvantage, or
 - discrimination between the person and other Molycop employees.
- harassment or intimidation harm or injury (including psychological harm)
- damage to property, reputation or business or financial position, or
- any other damage to a person.



Jim Anderson

Chief Executive Officer
August 2023



molycop.com

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