

Whistleblowing Policy

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Whistleblowing Policy

1 Our Commitment

Gold Corporation is committed to a culture of respect and ethical conduct in the way Gold Corporation employees, contractors, suppliers and customers work and relate to each other.

Gold Corporation recognises the value of complying with the laws and standards that apply to Gold Corporation in our work and encourage everyone to report Misconduct.

Gold Corporation will not tolerate Misconduct nor condone victimisation of anyone who intends to Disclose or has Disclosed Misconduct.

2 Objectives of this policy

This policy is an essential part of preventing Misconduct at Gold Corporation, and plays an important role in assisting Gold Corporation to identify wrongdoing that may not be uncovered unless there is a safe and secure means to make a Disclosure.

Gold Corporation encourages employees, contractors, officers, suppliers and customers to confidently speak up if they become aware of potential Misconduct.

The purpose of this policy is to:

- encourage and allow people to Disclose Misconduct;
- ensure Disclosures are properly and lawfully dealt with by Gold Corporation;
- help Gold Corporation deter and identify wrongdoing;
- ensure Whistleblowers and those who may be involved in an investigation understand:
 - the ways in which a Whistleblower can make a Disclosure;
 - the protections afforded to Whistleblowers by Gold Corporation; and
 - Gold Corporation's process for handling and investigating Disclosures; and
- outline how affected parties will be supported and protected from victimisation and retaliation.

Nothing in this policy is intended to change or take away any other protections which may be available at law.

3 Definitions

Act means Gold Corporation Act 1987 (WA).

Disclosure or **Disclose** means disclosure of Misconduct to a Disclosure Officer, Your Call or an external third party in accordance with this policy.

Disclosure Officer means any person listed in the table at part 6.1.1 of this policy.

Misconduct has the meaning given to it in clause 4 of this policy.

PID Act means Public Interest Disclosure Act 2003 (WA).

Proper Authority has the meaning given to it in the PID Act, and includes the people set out in section 6.4 of this policy. For additional examples, please see Annexure 2 to this policy.

Public Interest Information means information that tends to show that, in relation to its performance of a public function (either before or after the commencement of the PID Act, a public authority, a public officer or a public sector contractor is, has been, or proposes to be, involved in:

- improper conduct;
- an act or omission that constitutes an offence under a written law;
- a substantial unauthorised or irregular use of, or substantial mismanagement of, public resources;
- an act done or omission that involves a substantial specific risk of:
 - injury to public health;
 - prejudice to public safety; or
 - harm to the environment; or
- a matter of administration that can be investigated under section 14 of the Parliamentary Commissioner Act 1971.

Related Entity means each of GoldCorp Australia ABN 49 230 812 547, Western Australian Mint ABN 44 590 221 751 and W.A. Mint Pty. Ltd. ABN 12 054 024 314.

Whistleblower means current and former:

- officers and employees of Gold Corporation;
- individuals who supply goods or services to Gold Corporation and its Related Entities;
- an employee of a person or entity who supplies goods or services to Gold Corporation (both paid and unpaid);
- associates of Gold Corporation (i.e. a director or secretary of Gold Corporation or any of its Related Entities); and
- a relative or dependant of any persons listed from (a) to (d) in this definition.

Your Call means the independent whistleblower service to which a Whistleblower can make a Disclosure.

4 What is Misconduct?

Whistleblowers play an important role in identifying and reporting Misconduct and harm within an organisation. Gold Corporation values those people who report potential Misconduct. For the purposes of this policy, Misconduct includes:

- conduct that is dishonest, corrupt or illegal conduct, including bribery;
- a breach, failure to comply or contravention of the law, including the Act, or Gold Corporation policies;
- theft, fraud or misappropriation;
- damage, sabotage or violence;
- drug & alcohol sale or use (when in contravention of Gold Corporation's Fitness for Work Policy PO-0624);
- conduct that results in a significant risk to health and safety;
- serious inappropriate or unethical conduct;
- serious misuse of information;
- bullying, discrimination, harassment, some instances of sexual harassment or other serious unacceptable behaviour;
- a substantial waste of company resources;
- victimising someone for making or being involved in a Disclosure;
- conduct causing or likely to cause substantial financial or non-financial loss or detriment to Gold Corporation;
- an improper state of affairs or circumstances in relation to Gold Corporation or its Related Entities; and
- other serious improper conduct.

5 When should a Disclosure be made?

A Whistleblower should make a Disclosure under this policy if that Whistleblower has reasonable grounds to suspect that an employee, director, officer, contractor or supplier of Gold Corporation, or other person who has business dealings with Gold Corporation, has engaged in any form of Misconduct.

5.1 Personal work-related grievances

This policy is not intended to apply to personal or work-related grievances unless they evidence a systemic issue. Personal or work-related grievances include:

- an interpersonal conflict between people;
- a decision relating to the engagement, transfer or promotion of a person;
- a decision relating to the terms and conditions of engagement of a person;
- a decision to suspend or terminate the engagement of a person, or otherwise to discipline a person.

Employees are encouraged to raise personal work-related grievances and other issues not covered by this policy to their direct manager, or to the People and Culture team. Please refer to the Gold Corporation's Counselling & Discipline Policy and Guidelines PO-0569.

However, where Misconduct that may on its own be classified as a personal work-related grievance may:

- have other significant implications for Gold Corporation;
- have implications that extend beyond those that apply to the Whistleblower personally (i.e. other employees);
- involve multiple people on the receiving end of inappropriate behaviour; or
- indicate broader systemic issues,

including allegations of bullying or harassment, making a Disclosure in accordance with this policy is encouraged and will attract the protections that this policy offers to Whistleblowers.

5.2 Sexual Harassment

While Gold Corporation accepts that many instances of sexual harassment may be classified as a personal grievance, Gold Corporation understands that stand alone sexual harassment policies place a heavy onus on victims to complain, do not offer the same protections as this policy and contribute to sexual harassment being severely underreported. Reporting sexual harassment

can be a traumatic experience for the victim, especially where their identity is not protected.

Given the above, Gold Corporation encourages people affected by sexual harassment in the workplace to Disclose the sexual harassment in accordance with this policy. Where sexual harassment is disclosed to Gold Corporation in accordance with this policy, Gold Corporation will treat it as an eligible Disclosure (even if it is not), and the discloser of that sexual harassment will be afforded all of the protections this policy offers, including confidentiality.

5.3 Examples

For examples of where this policy applies, please see Annexure 1 of this policy.

6 How to Disclose Misconduct

A Disclosure may be made:

- internally to a Disclosure Officer;
- to Your Call; or
- to external authorities and entities.

Gold Corporation aims to identify and address any wrongdoing as early as possible, and in doing so intends to help build confidence and trust in this policy and the processes and procedures contained herein. Making a Disclosure internally to a Disclosure Officer or to Your Call in the first instance is the best way to allow Gold Corporation to do this.

6.1 Making a Disclosure internally to Gold Corporation.

Gold Corporation supports openness and teamwork. This policy is not intended to replace Gold Corporation's first obligation to resolve issues quickly and internally where appropriate. All reasonable attempts to resolve an issue should first be tried. Whistleblowers are encouraged to raise Misconduct at any time with their supervisors, managers or People & Culture to resolve Misconduct informally and internally.

If a Whistleblower does not feel safe or able to raise Misconduct with their supervisor or manager, a Whistleblower may make a Disclosure to a Disclosure Officer.

A Disclosure can be reported to a Disclosure Officer via email, telephone, in person or hard copy.

6.2 Making a Disclosure to Your Call

If for any reason a Whistleblower does not feel safe or able to make a Disclosure to a Disclosure Officer, the Disclosure may be made to Your Call.

Your Call operates under a Service Agreement with Gold Corporation and acts as the intermediary, providing the means for a Whistleblower to retain anonymity. Disclosures received by Your Call are reported to Gold Corporation in accordance with this policy. Your Call also enables Gold Corporation to obtain further information if required and enables the Whistleblower to receive updates from Gold Corporation.

6.1.1 Disclosure Officers

Name and position	Location	Contact details
Nick Foster, General Counsel and Company Secretary	Campbell Forrest House, Commercial Floor, 300 Hay Street, East Perth	Office Tel: +61 8 9421 7632 Mobile: 0410 337 829 Email: nick.foster@perthmint.com
Jane King, Chief People and Reputation Officer, Deputy CEO	300 Hay Street, East Perth	Office Tel: +61 8 9421 7266 Mobile: 0466 329 625 Email: jane.king@perthmint.com
Edwina Lewis, Group Manager, People & Culture	300 Hay Street, East Perth	Office Tel: +61 8 9421 7624 Mobile: 0417 945 814 Email: edwina.lewis@perthmint.com

This is done via the use of an online anonymous message board which the Whistleblower will have access to after making a Disclosure.

The message board allows the Whistleblower to:

- communicate with Your Call and/or Gold Corporation without revealing their identity;
- securely upload any relevant documentation and/or material that they wish to provide;
- receive updates;
- ask questions and post information for the attention of Gold Corporation; and
- request support or report victimisation.
- This option allows the Whistleblower to:
 - remain completely anonymous;
 - be identified to Your Call only; or
 - be identified to both Your Call and Gold Corporation.

Your Call enables disclosures to be made anonymously and confidentially. Whilst Gold Corporation prefers Whistleblowers to disclose their identity in order to facilitate an investigation, Whistleblowers are not required to identify themselves and will not be named in any report unless they have consented to their identity being disclosed.

Your Call is the external go-between a Whistleblower and Gold Corporation. Your Call will:

- receive a Disclosure;
- make a record of the information provided;
- ensure the Whistleblower's identity is kept confidential from Gold Corporation if that is what the Whistleblower wishes;
- allow the Whistleblower to access the Your Call message board to enable communication with Gold Corporation; and
- refer the Disclosure, including the information and documents provided, to Gold Corporation's Disclosure Officers within one business day.

Your Call is not the decision maker. All decisions relating to dealing with the Disclosure including the investigation and resolution of the Disclosure are entirely the responsibility of Gold Corporation.

6.2.1 Your Call Reporting Options

Your Call reporting options include:

- Website: <https://www.yourcall.com.au/report>
Available 24/7; and
- Telephone: 1300 790 228 available 9am and 12am on recognised Australian national business days (AEST).

Online reports can be made via the website address listed above. Gold Corporation's unique identifier code is "GCP".

In the event a Disclosure received by Your Call relates to a Disclosure Officer, Your Call will exclude that Disclosure Officer from all communications when providing the Disclosure to Gold Corporation. The Disclosure Officers who are not named in the Disclosure will then receive and determine how the matter will be addressed or investigated as required.

Your Call remains an independent intermediary at all times and will only communicate with those authorised within Gold Corporation.

6.2.2 National Relay Service

If a Whistleblower is deaf, or has a hearing or speech impairment, the Whistleblower can contact Your Call online or through the National Relay Service. Simply choose a contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.

6.3 Public Interest Disclosure

If a Whistleblower wishes to make a Disclosure to external authorities, they may be permitted to do so under the PID Act. For more information on making a Disclosure under the PID Act, please see Gold Corporation policy PO-0573 – Public Interest Disclosures Policy.

If a Disclosure is made under the PID Act, the provisions of PID Act will apply where they differ from this policy. Where a Whistleblower has made a Disclosure in accordance with the PID Act, this policy will apply where possible.

Proper Authorities

Name and position	Location	Contact details
Nick Foster, General Counsel and Company Secretary	Campbell Forrest House, Commercial Floor, 300 Hay Street, East Perth	Office Tel: +61 8 9421 7632 Mobile: 0410 337 829 Email: nick.foster@perthmint.com
Emma Soactar, Legal Counsel	Campbell Forrest House, Commercial Floor, 300 Hay Street, East Perth	Office Tel: +61 8 9421 7343 Mobile: 0432 731 272 Email: emma.soactar@perthmint.com

6.4 Other External Disclosure

Under the PID Act, certain Disclosures of Public Interest Information can be made to a Proper Authority. For the purposes of a Disclosure under the PID Act, the CEO has designated that the following people are Proper Authorities:

Annexure 2 of this policy provides further information on making a Disclosure under the PID Act. If you are considering making a Disclosure under the PID Act, you may wish to first speak to one of the Proper Authorities listed in the table above to discuss the information you have and the avenues available to you.

6.5 Supporting Evidence of Misconduct

Gold Corporation does not expect a Disclosure to include absolute proof of Misconduct. Where possible it should include:

- the name, job title and workplace address of the person or people the subject of the Disclosure;
- details of the Misconduct including dates, places and information regarding what was said or done;
- names of anyone who may substantiate the Disclosure; and
- any other evidence that supports the Disclosure such as emails, documents or CCTV.

These details will assist Gold Corporation in deciding how best to deal with and resolve the Disclosure.

7 Investigation Process

7.1 Investigation of the Disclosure

Gold Corporation will investigate a Disclosure under this policy as soon as practicable after the Misconduct has been reported.

If a Disclosure Officer is approached by a person wishing to make a Disclosure, the Disclosure Officer should first determine whether the location and time are

appropriate for a Disclosure to be made comfortably, and to ensure that a Whistleblower's identity is protected. If the location or time is not appropriate, the Disclosure Officer should arrange for an appropriate location and time to receive the Disclosure.

The Disclosure Officer who receives the Disclosure will firstly determine whether the Disclosure:

- qualifies for protection; and
- requires a formal, in-depth investigation.

If the Disclosure Officer determines that the Disclosure qualifies for protection and requires a formal investigation, the Disclosure Officer will convene an investigation team. The make-up of the investigation team will depend on the nature of the Disclosure, but will likely be a combination of people from the Risk and Compliance, Legal and People & Culture teams, as well as any external providers engaged by Gold Corporation for their specialist knowledge, or in situations where it is appropriate to have an external provider assist.

The investigation team will determine the appropriate investigation process, including:

- the nature and scope of the investigation;
- who will conduct the investigation and whether that person or people should be external to Gold Corporation;
- the nature of any technical, financial or legal advice that may be required; and
- a timeframe for the investigation (having regard to the level of risk and alleged Misconduct).

7.2 How will the investigation be conducted?

The investigation must be conducted in a constructive, objective and lawful way, and otherwise as is reasonable and appropriate having regard to the nature of the alleged Misconduct.

The investigator will conduct the investigation in accordance with Gold Corporation's standard practice (see Counselling & Discipline Policy and Guidelines PO-0569), and generally according to the following steps particular to a whistleblowing investigation:

- where the General Counsel and Group Manager People and Culture considers it necessary, contact Gold Corporation's external legal advisors;
- if possible, speak to the Whistleblower to obtain more information (where the Whistleblower wishes to remain anonymous and does not wish to make a statement, they will not be asked to do so);
- conduct a risk identification process in accordance with section 8.4 of this policy;
- inform the person or people to whom the Disclosure relates that a report has been received and is being investigated;
- ascertain whether there are any potential witnesses who should be interviewed, and interview those witnesses;
- gather information, material and documentation concerning the Disclosure as quickly as possible (this may involve taking steps to protect or preserve documents, materials and equipment including emails and historic documents);
- reviewing expenses, purchase orders, contracts and other data;
- concluding whether the allegations made in the Disclosure are substantiated; and
- preparing a report to document the outcome of the investigation as soon as is reasonably practical.

The Whistleblower will be kept informed of the progress of the investigation, where possible. All reasonable steps to protect the identity of the Whistleblower will be taken. Where disclosure of the identity of the Whistleblower cannot be avoided due to the nature of the allegations, the investigator will warn the Whistleblower of this probability.

7.3 Investigator's Report

At the conclusion of the investigation, the investigation team will provide a written report to the Gold Corporation CEO including:

- a finding of all relevant facts;
- whether the Disclosure is proven, not proven or otherwise; and

- recommendation as to any action that may be taken in respect of the findings.

Subject to privacy and confidentiality requirements, the findings of the investigation will be communicated to the relevant parties involved to the extent that it is legally permissible and appropriate to do so.

The Gold Corporation CEO will use the report to determine (in conjunction with the People and Culture team) the action (if any) to be taken including disciplinary action up to dismissal in accordance with Gold Corporations PO-0569 Counselling and Discipline Policy & Guidelines and/or SPR 0007 Disciplinary Procedure – Unauthorised Possession of Precious Metals.

The disciplinary action will depend on the severity, nature and circumstance of the Misconduct.

7.4 Best practice

Gold Corporation is committed to ensuring it follows best practice in investigations. Investigations must be objective, fair and independent. Therefore, investigations must be conducted independent of the Whistleblower, the individuals the subject of the Disclosure and the business unit involved.

7.5 Review

Where a Whistleblower is not satisfied with the outcome of an investigation, the Whistleblower may request a review as to whether Gold Corporation's policy, processes and procedures as set out in this policy were adhered to.

The review will be conducted by a Gold Corporation manager who was not involved in handling or investigating the relevant Disclosure.

While a Whistleblower is entitled to request a review, Gold Corporation is not required to reopen an investigation, and it can conclude a review if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

Where a review is conducted, the findings must be provided to the Board at the conclusion of the review.

8 What protections are available to Whistleblowers?

In order to be provided with protection under this policy, Disclosure must be made in accordance with part 6 of this policy.

8.1 Immunity from Disciplinary Action

Gold Corporation wants Whistleblowers to speak up against Misconduct.

Employees and Contractors who make a Disclosure:

- with reasonable grounds for suspecting Misconduct has or may occur; and
- have not engaged in Misconduct or illegal conduct relating to the Disclosure,

will be provided with immunity from disciplinary action by Gold Corporation.

8.2 Confidentiality and Privacy

Gold Corporation and Your Call will treat Disclosures in the strictest confidence. All reports and records relating to a Disclosure will be stored securely and able to be accessed only by authorised staff.

The confidentiality provisions do not preclude anyone involved in the Disclosure from sharing information with their (legal) representative or support person.

8.2.1 Does a Whistleblower have to disclose their identity?

There is no requirement for a Whistleblower to identify themselves in order for a Disclosure to qualify for protection under this policy.

8.2.2 Will a Whistleblower's identity be treated confidentially?

A Whistleblower's identity will not be disclosed by Your Call or Gold Corporation unless:

- the Whistleblower consents to the disclosure; or
- the disclosure is required by law.

An unauthorised disclosure of:

- the identity of a Whistleblower; or
- information that is likely to lead to the identification of the Whistleblower where the information was obtained because of the disclosure will be regarded as a disciplinary matter and will be dealt with in accordance with Gold Corporation's disciplinary procedures.

8.3 Protection against victimisation

Gold Corporation will do everything reasonably possible to support and protect from victimisation anyone who:

- intends to make or actually makes a Disclosure;
- is mentioned in the Disclosure;
- acts as a witness; or
- otherwise assists with the investigation and resolution of the Disclosure.

Gold Corporation will thoroughly investigate reports of victimisation. If proven, those who have victimised another will be subject to disciplinary action up to and including termination of employment in accordance with Gold Corporation's Counselling & Discipline Policy and Guidelines PO-0569.

Nothing in this policy is intended to change or take away any other protections which may be available at law.

8.4 Protection from detrimental acts or omissions

Gold Corporation will do everything reasonably possible to protect the Whistleblower from detriment, including conducting a risk identification process to establish whether anyone may have a motive to cause a detriment.

As part of an investigation, the investigator must assess:

- the risk of a Whistleblower's identity becoming known;
- who may have reason to cause detriment to a Whistleblower;
- whether there are any existing conflicts in the workplace; and
- whether there have already been threats to cause detriments.

If a Whistleblower's identity is known, the investigator should ask the Whistleblower these questions as part of the Whistleblowers interview.

If the investigator concludes that there is a risk of detriment, the investigator must evaluate the likelihood of each risk eventuating, and the severity of the consequences.

The investigator must then develop and implement strategies to prevent or contain the risk. In particular, when considering anonymous Whistleblower's who do not consent to the release of their identity, the investigator must consider whether the Whistleblower's identity could be readily guessed or become apparent during an investigation.

In developing and implementing strategies, the investigator may consider the following measures and mechanisms for protecting Whistleblowers:

- actions for protecting a Whistleblower from risk of detriment, for example:
 - allowing the Whistleblower to work from home or another location;
 - reassign the Whistleblower to another role at the same level;
 - make other modifications to the Whistleblower's workplace or the way they perform their duties;
 - reassign or relocate other personnel involved in the Misconduct.
- ensure that management are aware of their responsibilities to maintain confidentiality, address the risk of isolation or harassment, manage conflicts and ensure fairness when managing performance;
- implement strategies to help a Whistleblower minimise and manage stress, time or performance impacts;
- where detriment has already occurred, investigate the detrimental conduct, take disciplinary action where appropriate, and consider allowing the Whistleblower to take extended leave, develop a career development plan including new training and career opportunities, or offer compensation or other remedies.

The investigator must then monitor the risk of detriment throughout the investigation and reassess as required. If the investigator deems it appropriate given the circumstances of the Disclosure, the investigator may consider appointing a whistleblower protection officer who is separate and independent from the investigation to assist the investigator in protecting and safeguarding Whistleblowers and ensuring the integrity of the investigation.

If a Whistleblower believes they have suffered detriment, they may seek independent legal advice or contact regulatory bodies such as APRA.

9 Every person's responsibility

Every person to whom this policy applies has a responsibility to:

- remain alert to Misconduct;
- report known or suspected Misconduct in accordance with this policy;
- act in a way that reduces, prevents or stops Misconduct;
- support (and not victimise) those who have made or intend to make a Disclosure; and
- ensure the identity of the Whistleblower and the person or people who are the subject of the Disclosure are kept confidential.

10 Reporting the matter to external authorities

Where:

- findings of an investigation into Misconduct reveal conduct that may constitute a criminal offence; or
- required by law,

Gold Corporation will provide the information given in the Disclosure to a relevant external agency such as the police.

11 What are the consequences of making a false Disclosure?

Gold Corporation expects that any report made in accordance with this policy is made honestly and ethically.

Anyone who makes a Disclosure knowing it to be false or misleading may be subject to disciplinary action, including termination of employment in accordance with Gold Corporations PO-0569 Counselling and Discipline Policy & Guidelines and/or SPR 0007 Disciplinary Procedure – Unauthorised Possession of Precious Metals.

The disciplinary action will depend on the severity, nature and circumstance of the false Disclosure.

12 Information and Advice

If a Whistleblower needs information and advice about making a Disclosure or the support and protection available, Whistleblowers may discuss the matter in confidence with their immediate supervisor, manager or the People & Culture team.

In the event a Whistleblower does not formally make a Disclosure following such a discussion, Gold Corporation may nevertheless be compelled to act on the information provided during the discussion if the information reasonably suggests misconduct has or may occur.

This policy is available to employees and officers of Gold Corporation on the Gold Corporation intranet and external website.

Gold Corporation will provide annual training for employees regarding this policy, and training for all new starters.

13 Support

If necessary, Gold Corporation will appoint a welfare officer to arrange or coordinate support for anyone who has or is in the process of making a Disclosure.

The support may include a support person and or other support services as may be appropriate based on the circumstances.

A welfare officer is appointed by Gold Corporation through Your Call to:

- assess the immediate welfare and protection needs of a Whistleblower;
- safeguard the interests of a Whistleblower in accordance with this policy and the law; and
- address any issues or concerns of victimisation/detrimental treatment.

Employees are also encouraged to contact the Gold Corporation Employee Assistance Plan provider PeopleSense by Altius either by using the MintMinds Platform or by calling 1300 307 912 for support when needed.

14 Report to the Board

The Gold Corporation General Counsel will arrange for the compilation of a report to the Board at least once a year on the effectiveness of this policy.

Subject to privacy and confidentiality the report will include:

- a brief description of any Disclosure that occurred that year;
- the action taken in response to the Disclosure;
- the outcome; and
- the timeframe in resolving/finalising the Disclosure.

15 Review of this Policy

The General Counsel will monitor and review this policy every two years to ensure it meets its objectives.

Any amendments to this policy shall be made known by posting an updated version of the policy on the Gold Corporation intranet and external website.

Annexure 1 – When does this policy apply?

If a report of Misconduct is solely about a personal grievance in the workplace, this policy does not apply. A personal work-related grievance has implications for an individual personally and does not have significant implications for Gold Corporation. However, pursuant to section 5.2 of this policy, reports of sexual harassment will also be investigated in accordance with this policy.

Quiz

- 1. Eric's supervisor Susan has recently promoted Pranav within the team. Pranav and Eric were both hoping to be promoted. Eric believes that Susan promoted Pranav instead of Eric because Susan and Eric have had disagreements in the past and do not get on.**
 - Q. Can Eric make a Disclosure under the Whistleblower Policy?
 - A. This is an example of a personal work-related grievance. Any Disclosure by Eric would not be eligible for the whistleblower protections.
 - Q. What should Eric do instead?
 - A. Eric should refer to Gold Corporation's Counselling & Discipline Policy and Guidelines PO-0569, and consider raising the issue with his manager or the People and Culture team.
- 2. Matthew and Laura work in the refinery. Matthew tells Laura to avoid the procurement procedures in place and instead make sure that all contracts for machinery maintenance are with 123 Company. Laura speaks to 123 Company and discovers that Matthew's sister is the owner.**
 - Q. Can Laura make a Disclosure under the Whistleblower Policy?
 - A. Yes. Misconduct includes a breach or failure to comply with Gold Corporation policies and serious unethical conduct.
- 3. Tom and Jennifer have worked together for 6 months. Over that time, Tom has repeatedly asked Jennifer to go out with him, despite her refusals, and will often rub her back during the workday and try to hug her hello and goodbye.**
 - Q. Can Jennifer make a Disclosure under the Whistleblower Policy?
 - A. Yes. Section 5.2 of this policy allows Jennifer to make a Disclosure of sexual harassment and receive the protections outlined in this policy, as long as the Disclosure is to Gold Corporation (internally or via Your Call).
- 4. Susan works in accounts with Vera. Susan takes 2 weeks leave and Vera covers her duties in that time. Over the course of the 2 weeks, Vera discovers some irregularities with the accounting practices being used, and 2 or 3 payments a week for at least the past year to the same account, without appropriate records to reconcile the payments. Vera believes that Susan has been fraudulently transferring money to her personal account.**
 - Q. Can Vera make a Disclosure under the Whistleblower Policy?
 - A. Yes. Misconduct includes conduct that is illegal, theft and fraud.

5. Josh believes that a senior manager in his team has received payment in return for offering a client a reduced price on certain products.

Q. Can Josh make a Disclosure under the Whistleblower Policy?

A. Yes. Misconduct includes conduct that is dishonest, unethical, conduct causing or likely to cause substantial financial or non-financial loss or detriment to Gold Corporation and an improper state of affairs or circumstances.

6. Raya notices that a number of new employees and contractors have started work in the CD recently, and they don't seem to have received the induction and safety training that is normally provided to new starters. Raya sees several unsafe work practices over the course of a week and brings the issue to her manager's attention. Raya's manager tells her that due to COVID and staff shortages, they just have to make do for a while with what they had, and there was no capacity to provide further training.

Q. Can Raya make a Disclosure under the Whistleblower Policy?

A. Yes. Misconduct includes conduct that results in a significant risk to health and safety.

7. Jack notices that the refinery is receiving doré from a new supplier, however he doesn't remember being involved in the usual risk and compliance checks. Jack makes some enquiries and realises that the source of the doré has not been verified, and it is likely that the gold was mined using modern slavery. Jack also sees documents which suggest that the usual checks were skipped because some members of the Gold Corporation board are directors of the supplier.

Q. Can Jack make a Disclosure under the Whistleblower Policy?

A. Yes. Misconduct includes an improper state of affairs in relation to Gold Corporation, conduct that is dishonest or corrupt, a breach of the law or Gold Corporation policies, conduct that is likely to cause substantial non-financial detriment to Gold Corporation and serious inappropriate or unethical conduct.

8. Lorraine makes a Disclosure to a Disclosure Officer about workplace bullying that she has been subject to. She tells the Disclosure Officer that she has been made to feel unwelcome in her team and she dreads going to work.

Q. Does Lorraine's Disclosure qualify for protections under this policy?

A. At first glance, this may seem like a personal workplace grievance. However, a Disclosure Officer should be careful not to dismiss Lorraine's complaint. The Disclosure Officer should ask for more details and consider conducting an investigation, as Lorraine's experience may be indicative of a larger or systemic issue in an environment where other Misconduct may be occurring.