

## Whistleblowing Policy

At Galaxy we are committed to conducting our business with honesty and integrity, and we expect all our people to maintain high standards in accordance with our internal policies. This Policy sets out the procedure that will apply when a Galaxy representative suspects wrongdoing, unethical conduct or dangers at work which may affect others. We encourage Galaxy representatives to raise any concerns that they may have as soon as possible with us, in the knowledge that their concerns will be taken seriously and investigated appropriately, and that their confidentiality will be treated as a priority. In addition, we have regulatory requirements to report any misconduct or any breaches of any regulatory body's rules or procedures.

Complaints relating to your own personal circumstances, such as the way you have been treated at work should be addressed under Galaxy's applicable workplace behaviour policy.

This Policy does not form part of your terms and conditions of employment. We reserve the right to change or withdraw this Policy from time to time. The information within this Policy replaces all previous relevant policies.

If you have any questions in relation to this Policy, you should contact your local Human Resources Manager or Galaxy's General Counsel.

Thank you.

Martin Rowley  
Chairman  
On behalf of the Board of Galaxy Resources Limited

### 1. Who is covered by this Policy?

This Policy applies to every individual working in or with Galaxy, at any level or grade, wherever located, including all employees (whether permanent, fixed-term or temporary), directors and officers (**Galaxy Representatives**).

References in this Policy to '**Galaxy**' are to Galaxy Resources Limited and all its subsidiaries and associated companies worldwide, including joint venture companies in which Galaxy has an interest.

### 2. What is whistleblowing?

Whistleblowing is the raising of a concern about suspected wrongdoing, unethical conduct or dangers at work which may affect others. Such concerns may relate to:

- a) criminal activity;
- b) miscarriages of justice;
- c) danger to health and safety;
- d) damage to the environment;
- e) failure to comply with any legal or professional obligation or regulatory requirements;
- f) bribery;
- g) corruption;
- h) financial fraud or mismanagement;
- i) negligence;
- j) breach of Galaxy's internal policies;
- k) conduct likely to damage Galaxy's reputation;
- l) unauthorised disclosure of confidential information; and
- m) the deliberate concealment of any of the above matters.

These examples are not exhaustive or exclusive and situations of a similar nature as determined by the General Counsel will be dealt with under this Policy.

If you have any genuine concerns related to suspected wrongdoing, unethical conduct or dangers at work which may affect others you should report it to us under this Policy. A Galaxy Representative will not be dismissed or victimised if they raise genuine concerns in accordance with this Policy and act in good faith. We would prefer that you raise any concerns than leave them unaddressed.

Maliciously making a false allegation will be dealt with in accordance with Galaxy's workplace behaviour policy.

### 3. How to raise a concern

#### 3.1. Raising a concern internally

In the first instance, unless you reasonably believe your manager to be involved in the wrongdoing, you should raise any concerns with your manager. You may tell them in person or put the matter in writing if you prefer.

Your manager will arrange an investigation into the matter (either by investigating the matter personally or by immediately passing the issue to someone in a more senior or other appropriate position). The investigation may involve you and other individuals providing written statements. Any investigation will be dealt with thoroughly, promptly and confidentially wherever possible. Your manager (or the person who carried out the investigation) will then report to the General Counsel who will take any necessary action, including reporting the matter to any appropriate regulatory body, if required. If wrongdoing is discovered as a result of any investigation, this will be dealt with under Galaxy's applicable workplace behaviour policy. On conclusion of any investigation, if appropriate, you will be told the outcome of the investigation and what has been done, or what Galaxy proposes to do. If no action is to be taken, the reason for this will be explained.

If you are concerned that your manager is involved in the wrongdoing, has failed to make a proper investigation, or has failed to report the outcome of the investigations to the General Counsel, you should inform Galaxy's General Counsel. Any approach to the General Counsel will be treated in confidence.

#### 3.2. Using Galaxy's whistleblower service

In addition to the above options, there may be circumstances where you consider it is preferable to contact our external whistleblower service. In those cases, please use any of the following details to make contact:

Galaxy has contracted Your Call Whistleblowing Solutions (**Your Call**) to receive and manage your report with impartiality and confidentially.

This option allows you to either:

- remain completely anonymous;
- identify yourself to Your Call only; or
- identify yourself to both Your Call and Galaxy.

Please use any of the following details to make contact with Your Call Whistleblowing Solutions:

Phone: 1300 790 228 (within Australia); or

+61 3 9895 0012 (outside Australia)

9am to 12am AEST, recognised business days

Email: [galaxy@yourcall.com.au](mailto:galaxy@yourcall.com.au)

Web: [www.yourcall.com.au/report](http://www.yourcall.com.au/report) (Enter the unique ORG ID: **Galaxy**)

Available 24/7

Post: Locked Mail Bay 7777, Malvern VIC 3144

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at [www.relayservice.gov.au](http://www.relayservice.gov.au) and request Your Call's hotline 1300 790 228.

If you have difficulty speaking or understanding English, contact Your Call through the Translating and Interpreting Service (TIS) 131 450 and ask for Your Call on 1300 790 228.

Your Call remains the intermediary at all times, receiving and forwarding communication between all parties.

You be able to securely upload any relevant documentation and/or material relevant to your disclosure.

After making a disclosure, you will be provided with a unique Disclosure Identification Number (**DIN**) and access to a secure online Message Board. The Message Board allows ongoing anonymous communication with Your Call and/or Galaxy. The Message Board

can be used to receive updates, share further information/evidence and request support or report retaliation. If you cannot access the Message Board, you can contact Your Call via phone (above) for verbal updates.

More information about the whistleblower service is available online at <https://www.whistleblowing.com.au/support-centre/>.

## **4. General guidance**

### **4.1. Confidentiality**

We hope that Galaxy Representatives will feel able to voice concerns openly under this Policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you first.

We do not encourage Galaxy Representatives to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. If you are concerned about possible reprisals if your identity is revealed, you should contact your Human Resources representative, or the General Counsel and appropriate measures can then be taken to preserve confidentiality.

Participants in the investigation procedure are required to keep confidential all relevant information and electronic recordings of any investigation meetings are not permitted unless all those attending agree.

### **4.2. External Disclosures**

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing. In most cases, you should not find it necessary to alert anyone externally. We strongly encourage you to seek advice before reporting a concern to anyone external.

### **4.3. Protection and Support**

Galaxy Representatives may be worried about possible repercussions of making a disclosure. We aim to encourage openness and will support Galaxy Representatives who raise genuine concerns under this Policy, even if they turn out to be mistaken.

Galaxy Representatives acting in good faith will not suffer victimisation or detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your local Human Resources Manager.

Galaxy Representatives must not threaten or retaliate against anyone who has raised a genuine concern under this Policy. Involvement in such conduct will be dealt with in accordance with Galaxy's applicable workplace behaviour policy.

For the avoidance of doubt, no financial reward will be made to Galaxy Representatives where the disclosure, reporting or investigation of the wrongdoing, unethical conduct or dangers at work results in financially quantifiable losses, or financial penalties.

An instruction to cover up wrongdoing is itself a disciplinary offence and will be dealt with in accordance with Galaxy's applicable workplace behaviour policy. If you are told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the appropriate person, as detailed above.

Approved by Galaxy Resources Limited Board

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