



## Whistleblowing Policy

**At Kenmare, our actions are informed by our guiding principles: we care, we grow, we excel. We are committed to integrity, commitment, accountability, respect and excellence (ICARE) in all aspects of our business. We encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be protected wherever possible.**

Whistleblowing is the disclosure of information that relates to suspected misconduct or wrongdoing, including, but not limited to, criminal activity, bribery, improper conduct or unethical behavior. A whistleblower is a person who has a reasonable belief that such misconduct or wrongdoing has occurred and who raises a concern in this regard.

Laws in Ireland, Mozambique and the UK protect employees when making certain defined disclosures, in order to encourage the reporting of wrongdoing (whistleblowing).

In line with our commitment to ICARE, Kenmare will:

- Comply with all whistleblowing legislation and regulations applicable to its business and its employees.
- Provide our employees with guidance as to how to raise those concerns (please see page 2 of this policy) and handle such concerns in a fair and appropriate way.
- Put in place appropriate structures to process whistleblower reports. We conduct internal monitoring of whistleblower reports and we disclose the number of reports received on a yearly basis in our Annual Report. If any reports are received, we also disclose the types of misconduct reported and the measures taken to investigate the report and to remedy the issue.
- Reassure employees that they can raise concerns anonymously, if they so choose, with reports treated confidentially. Kenmare however does not encourage anonymous disclosures as proper investigation may be difficult or impossible if we cannot obtain further information from employees and establish the validity of allegations. Kenmare aims to encourage openness and will support employees who raise concerns under this policy.

- Reassure employees that Kenmare will not tolerate any victimisation or detrimental treatment of employees who raise a whistleblowing concern, even if they turn out to be mistaken.
- Make the Whistleblowing Policy available to all employees in Portuguese, the official language of Mozambique, as well as in English. This Whistleblowing Policy is available on Kenmare's website and it is made available to our third-party service providers.
- Proactively communicate the Whistleblowing Policy to new employees during their induction and provide training on it to existing employees on a regular basis.

### **Raising a whistleblowing concern**

This is a summary of the more detailed procedure that is set out in Kenmare's Whistleblowing Procedure:

#### *Option 1 – Line manager or relevant department head*

Employees are encouraged to raise any concerns with their Line Manager or relevant Department Head, where possible. They may tell them in person or put the matter in writing. They may be able to agree a way of resolving the concern quickly and effectively.

#### *Option 2 - Call the independent confidential external line*

Where the matter is more serious, or an employee feels that their Line Manager or relevant Department Head has not addressed their concern, or if the employee prefers not to raise it with them for any reason, they should utilise the independent confidential hotline or email address.

The company providing this service is called Safecall, a global 24/7 whistleblowing hotline that is focused on safely allowing ethical transparency between a company and its employees. Safecall provides an independent external reporting line where employees or other stakeholders can raise concerns, in Portuguese or English, about Kenmare and be assured that it will be investigated. Safecall summarise the content of the call and send it (with a copy to our General Counsel) to Kenmare's Internal Auditor, or in certain circumstances to the Company Secretary, who will then consider the appropriate next steps.

Safecall will not disclose the employee's name to Kenmare if they wish to remain anonymous. The Safecall service is available 24 hours a day, 365 days a year via the number below:



Alternatively Safecall can be contacted via e-mail at [kenmare@safecall.co.uk](mailto:kenmare@safecall.co.uk) or via the web: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

#### *Option 3 - Senior Non-Executive Director or General Counsel*

If these channels have been followed and employees still have concerns, or if employees feel the matter is so serious that it cannot be discussed with any of the above, they should contact the Audit & Risk Committee

Chairperson, Deirdre Somers at [dsomers@kenmareresources.com](mailto:dsomers@kenmareresources.com) or the General Counsel, Rajan Subberwal, on +353 87 220 9854 or [rsubberwal@kenmareresources.com](mailto:rsubberwal@kenmareresources.com).

Kenmare will ensure that employees understand and adhere to this Whistleblowing Policy. For more information, Kenmare employees should refer to our Whistleblowing Procedure.

We will also ensure that third-party service providers (including contractors, suppliers, and business partners) are aware of our Whistleblowing Policy.

The Whistleblowing Policy is implemented by members of the Executive Committee and site leadership. The Audit & Risk Committee, and more widely the Board of Directors, has responsibility for overseeing companywide compliance to the Whistleblowing Policy.

Effective date: 11 March 2020

#### Document revision control

Revision number	Page number	Change effected	Date of issue
2	2 + 3	<ul style="list-style-type: none"><li>• Circulation of Safecall report</li><li>• Audit &amp; Risk Committee contact</li></ul>	11 March 2020