Whistleblower Policy

1. OVERVIEW

1.1. At Group 6 Metals Limited (Company), it is expected that all employees embody our values in all our business activities.

1.2. The Whistleblower Policy (Procedure) is designed to support and assist the Company to promote a culture of ethical corporate behaviour, thereby providing an environment in which internal and external stakeholders are able to report an issue they genuinely believe breaches the Company's Code of Conduct and Business Integrity.

1.3. This Procedure outlines how the Company will deal with such reports and sets out avenues for stakeholders to report such issues.

2. SCOPE

2.1. This Procedure applies to all Company Stakeholders, defined for this purpose as current and former employees (including contractors and consultants), Directors and suppliers for all entities within the Company and their close relatives or associated entities.

3. DISCLOSABLE MATTERS

3.1. Disclosable matters include misconduct or an improper state of affairs, relating to G6M's operations. This may involve breaches of law, unethical behaviour, financial irregularities, or systemic issues. Personal work-related grievances are generally excluded unless they involve victimisation or breach of whistleblower protections. Reportable Conduct may include any conduct that involves:

- actions that are dishonest, fraudulent, or corrupt, including bribery or other activity in breach of the Bribery and Corruption provisions of the Company Code of Conduct and Business Integrity
- illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law)
- unethical behaviour or behaviour in breach of Company policies (such as dishonestly altering company records or data, adopting questionable accounting practices, or wilfully breaching the Company Code of Conduct and Business Integrity or other Company policies or procedures).
- potential damage to Company stakeholders such as unsafe work practices, environmental damage, health risks or abuse of Company property or resources
- abuse of authority • financial loss to the Company, damage to the Company's reputation or any other issue that may be detrimental to Company interests
- harassment, discrimination, victimisation, or bullying, or
- any other kind of misconduct, observation or perception of an issue that may impact the Company in any of the areas outlined above.

4. RESPONSIBILITY TO REPORT

4.1. The Company relies on its Stakeholders to maintain and enhance a culture of honest and ethical behaviour. The Company does not tolerate any conduct that comprises Reportable Conduct. It is therefore expected that any Stakeholder who becomes aware of Reportable Conduct will report its occurrence under this Procedure.

5. REPORTING

The Company has several channels through which a person who becomes aware of Reportable Conduct may report its occurrence:

5.1. Internal Reporting

5.1.1. Stakeholders may wish first to discuss the Reportable Conduct informally with their Company direct report/line Manager, or the Company Secretary to determine whether serious misconduct has occurred.

5.1.2. This is an opportunity to clarify the incident, ask questions and determine whether the matter falls under this Procedure. At all times, it is expected that these discussions will remain confidential.

5.1.3. Where a Stakeholder believes that internal reporting is not appropriate, The Company encourages Stakeholders to seek out and report the matter to the external contact listed in

5.2. External Reporting

5.2.1. A whistle-blower may make a report to the Company's external independent Whistleblowing provider, Bill Fitzgerald, using any of the following methods:

- Email: **fitzgeraldbill1951@gmail.com**
- Phone: 0418 127 020

5.2.2. An external report may be made anonymously, if desired, using any of the above methods. The Company will work to ensure that anonymously reported incidents are substantiated and investigated appropriately, including endeavouring to provide updates to the notifier.

5.2.3. Calls will be received by the Company's external independent Whistleblowing service on recognised Australian business days between 9.00 AM and 4.00 PM (AEST). Outside these times, please email with your concerns and Bill will respond accordingly.

5.2.4. Calls are not recorded. Whistleblowers will be provided with a confidential reference number by our independent provider.

5.2.5. The independent provider will prepare a report which details the misconduct reported by the whistle-blower. All independent service provider reports will be forwarded to the Group 6 Metals Company Secretary. Reports made under this Procedure should describe the grounds for the report and provide as much detail as possible of all relevant facts and supporting documentation (if any). The report will not contain the name of the whistle-blower.

5.2.6. Information contained in reports and provided by whistle-blowers in the course of an investigation will be kept confidential, except as required by law or where disclosure is necessary to regulatory authorities, law enforcement agencies or professional advisors to the Group.

6. INVESTIGATION OF REPORTABLE CONDUCT

6.1. The Company will investigate all matters reported under this Procedure as soon as practicable after the matter has been reported. The Company Secretary or designated Company site contact may, with consent of the reporting party (if the report is not anonymous) appoint a person to assist in the investigation of a report.

6.2. Where appropriate, the Company will provide feedback to the reporting party regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations may have been made).

6.3. The investigation will be conducted in an objective and fair manner, and as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the surrounding circumstances.

6.4. While the investigation process and enquiries adopted will be determined by the nature and substance of the report, in general, as soon as practicable upon receipt of the report, if the report is not anonymous, the Company Secretary or investigator will contact you to discuss the investigation process. This will include the process of how-to follow-up on the investigation, and other matters as relevant to the investigation.

6.5. Where a report is submitted anonymously, the Company will conduct the investigation and its enquiries based on the information provided.

7. PROTECTION OF WHISTLEBLOWERS

7.1. The Company is committed to ensuring confidentiality in respect of all matters raised under this Procedure and will ensure that those who make a report are treated fairly and do not suffer detriment. A Stakeholder making a report in good faith in accordance with this Procedure (a "Whistleblower") will not be discriminated against or disadvantaged in their employment or engagement with the Company, even if the report is subsequently determined to be incorrect or not substantiated.

7.2. All reasonable steps will be taken to ensure that a Whistleblower is not subject to any form of victimisation, discrimination, harassment, demotion, dismissal, or prejudice, as a result of having lodged a report. However, depending on the nature of the incident, this Procedure may not protect the Whistle-blower if the Whistle-blower has been involved in or is connected to the misconduct or illegal activities that are being reported.

7.3. If the Whistleblower wishes to benefit from statutory protections provided to whistleblowers (see Annexures A and B) they may also have to disclose their name. In these instances, the Company will continue to ensure that the Whistle-blower is afforded statutory protections.

7.4. A report may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of misconduct. It is therefore very important that those who make a report under this Procedure do so in good faith, with reasonable grounds for believing that the information is correct or likely to be correct.

7.5. The Company takes very seriously all reports made under this Procedure and would look unfavourably on any report that is knowingly false or misleading. Appropriate action, including disciplinary action in the case of an employee, may be taken against any Stakeholder who knowingly makes a report that is not in good faith.

7.6. A report will be considered to not have been made in good faith if it is frivolous, raised for a malicious reason or ulterior motive, or if it is not based on facts and/or circumstances that provide a reasonable basis for the report. Repeated reports about trivial matters may also be considered not to be made in good faith.

8. AMENDMENT OF THIS PROCEDURE

8.1. This Procedure cannot be amended without approval of the Group 6 Metals Board of Directors. It will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of the Company