

INTERNAL DOCUMENT

Document Name	WHISTLE BLOWING POLICY
Document Number	BFGOVPOL02
Effective From	1 December 2007

TABLE OF CONTENTS

1. PURPOSE	2
2. SCOPE	2
3. GOVERNING DOCUMENT / LEGISLATIVE CONTEXT	2
4. DEFINITIONS	2
5. POLICY	2
WHAT IS A WRONGDOING?	2
HOW WILL BLUEFIN RESOURCES PROTECT A WHISTLEBLOWER?	3
WHAT IF A WHISTLE-BLOWER IS IMPLICATED IN THE WRONGDOING?	4
WHAT IS NOT COVERED BY THIS POLICY?	4
REPORTING AND INVESTIGATIONS	5
HOW TO REPORT A WRONGDOING?	5
HOW WILL THE INVESTIGATION BE CONDUCTED?	5
POSSIBLE OUTCOMES OF THE INVESTIGATION	5
WRONGDOINGS THAT ARE DEALT WITH UNDER THE <i>CORPORATIONS ACT 2001 (CTH)</i>	6
HOW TO REPORT A WRONGDOING UNDER THE CORPORATIONS ACT	6
ACTIONS FOLLOWING RECEIPT OF REPORT OF WRONGDOING UNDER THE CORPORATIONS ACT	6
MALICIOUS REPORTS	7
REPORT A WRONGDOING	7
6. RESPONSIBILITIES	7
7. COMMUNICATION	7
8. COMPLIANCES, BREACHES, AND DISCIPLINARY ACTIONS	7
9. RELATED DOCUMENTS	ERROR! BOOKMARK NOT DEFINED.
10. DOCUMENT CONTROL	7
11. APPROVAL	7

Document: Whistle Blowing Policy		Document Owner: Director – Commercial & Operations	
Document No.: BFGOVPOL02	Version No.: 5	Issue Date: 1/12/2007	Review Date: 20/11/202324
Printed versions of this document are not controlled. Please refer to the Bluefin Resources Intranet for the latest version.			Page: 1 of 8

INTERNAL DOCUMENT

1. PURPOSE

This policy directly supports Bluefin Resources' core values, which enshrine the principle that it will conduct its business legally and ethically.

The purpose of this policy is to strengthen Bluefin Resources core values by empowering persons who wish to report in good faith any Wrongdoing (examples of which are provided below) without fear of reprisal. This document outlines the way in which Bluefin Resources will respond to reports of Wrongdoing.

This policy is intended to complement (not replace) Bluefin Resources usual reporting avenues for raising issues of concern (for example, by talking to the relevant manager). This policy may be invoked where those existing avenues appear to have failed or may be inappropriate.

2. SCOPE

In this policy, the term "person" refers to employees, contractors, candidates, suppliers, staff and other stakeholders or members of the public who have dealings with Bluefin Resources.

3. GOVERNING DOCUMENT / LEGISLATIVE CONTEXT

Corporations Act 2001 – http://www.austlii.edu.au/au/legis/cth/consol_act/ca2001172/

Australian Securities & Insurance Commission (ASIC) Act 2001
http://www.austlii.edu.au/au/legis/cth/consol_act/asaica2001529/

4. DEFINITIONS

- **Person:** refers to employees, contractors, candidates, suppliers, officers and other stakeholders or members of the public who have dealings with Bluefin Resources
- **Whistle-blower:** refers to a person who alerts the authorities to misconduct
- **Authorities:** refers to
 - Australian Securities & Investments Commission (ASIC)
 - The company's auditor
 - A member of an auditing team appointed to conduct an audit of the company
 - A director, secretary
 - Senior manager of the company
 - The Whistle-blowing Officer
- **Company:** Bluefin Resources Pty Limited (Bluefin Resources)

5. POLICY

In keeping with the spirit of Bluefin Resources Code of Conduct and other related policies, Bluefin Resources encourages persons who have witnessed, or know about, any Wrongdoing to report it in accordance with this Policy.

What Is a Wrongdoing?

For the purposes of this policy, a Wrongdoing can be anyone, or more, of the following:

- **Unlawful conduct** – this includes non-compliance with legislation, regulation, codes, guidelines, and other regulatory instruments.

Document: Whistle Blowing Policy		Document Owner: Director – Commercial & Operations	
Document No.: BFGOVPOL02	Version No.: 5	Issue Date: 1/12/2007	Review Date: 20/11/202324
Printed versions of this document are not controlled. Please refer to the Bluefin Resources Intranet for the latest version.			Page: 2 of 8

INTERNAL DOCUMENT

- Conduct that is in breach of any Bluefin Resources policy.
- Conduct that falls below established standards or practice.
- Unethical or improper conduct.
- Criminal activity.
- Misuse of Bluefin Resources funds or assets, financial malpractice, impropriety or fraud.
- Conduct that endangers employees or the public generally.
- Conduct that jeopardises the safety of employees, or of the environment in which they are working.
- Wasteful conduct.
- An abuse of authority.
- Breach of confidentiality obligations
- Suppression or concealment of any information relating to any of the above types of actions.
- Taking or threatening to take detrimental action against anyone who reports a Wrongdoing in reprisal for reporting that Wrongdoing.

Bluefin Resources is strongly committed to providing persons with the opportunity to use the whistle-blowing process outlined in this Policy for genuine disclosures about suspected Wrongdoing. The whistle-blowing process must not be used for vexatious matters.

Please note that specific reporting requirements apply if an alleged Wrongdoing relates to a contravention, or suspected contravention of the *Corporations Act 2001 (Cth)*. See section 6 "*Impact of the Corporations Act 2001 (Cth)*" below.

How Will Bluefin Resources Protect a Whistleblower?

Bluefin Resources will not tolerate any form of harassment or retaliation against a person who reports a Wrongdoing in accordance with this Policy (Whistle-blower). Provided any report of Wrongdoing is made:

- in good faith, that is, reasonably believing it to be true; and
- without malice,

Bluefin Resources will protect a Whistle-blower. Specifically, Bluefin Resources will not allow any of the following to happen to a Whistle-blower because of the Whistle-blower's report of Wrongdoing:

- Any type of harassment or bullying.
- Any type of disciplinary action.
- A decision not to promote the Whistle-blower.
- A decision not to grant a salary increase to the Whistle-blower.

Document: Whistle Blowing Policy		Document Owner: Director – Commercial & Operations	
Document No.: BFGOVPOL02	Version No.: 5	Issue Date: 1/12/2007	Review Date: 20/11/202324
Printed versions of this document are not controlled. Please refer to the Bluefin Resources Intranet for the latest version.			Page: 3 of 8

INTERNAL DOCUMENT

- Rejection during probation.
- A performance evaluation in which the Whistle-blower's performance is judged as being unsatisfactory solely on account of reporting the matter.
- Involuntary demotion or reassignment to a position with demonstrably less responsibility than the one held prior to the reassignment.
- Unfavourable change in the general terms and conditions of employment or contract.
- Involuntary resignation.
- Involuntary retirement.
- Termination of employment, or contract.
- Failure to consider candidature of the Whistle-blower in accordance with the usual criteria and processes.
- Termination or threatening to terminate supply of goods or services of the Whistle-blower.
- Any other conduct that is discriminatory towards the Whistle-blower.

Threats to cause detriment (whether express, implied, conditional, or unconditional) are also prohibited. Under this Policy, it is irrelevant whether the person threatened actually fears that the threat will be carried out.

What If A Whistle-blower Is Implicated In The Wrongdoing?

Even though a person who reports a suspected Wrongdoing may be implicated in the Wrongdoing, that person must not be subjected to any actual or threatened detrimental action taken in reprisal for reporting that Wrongdoing.

However, reporting a Wrongdoing will not necessarily shield the Whistle-blower from the consequences flowing from involvement in the Wrongdoing itself. A person's liability for their own conduct is not affected by their disclosure of that conduct under this Policy (though in some circumstances, an admission of complicity in the Wrongdoing may be a mitigating factor when considering disciplinary or other action.)

What Is Not Covered by This Policy?

This Policy is primarily concerned with issues that may affect the wellbeing and best interests of Bluefin Resources.

It does not apply to grievances from employees or employment contract issues. Any complaints of injustice in the assessment of an employee's performance, or discrimination, harassment, or bullying, will be dealt with by the CEO of Bluefin Resources under the appropriate Bluefin Resources policy.

If employees need clarification about whether a complaint should be addressed under this Policy or not, they should contact the Whistle-blowing Officer.

Document: Whistle Blowing Policy		Document Owner: Director – Commercial & Operations	
Document No.: BFGOVPOL02	Version No.: 5	Issue Date: 1/12/2007	Review Date: 20/11/202324
Printed versions of this document are not controlled. Please refer to the Bluefin Resources Intranet for the latest version.			Page: 4 of 8

INTERNAL DOCUMENT

Reporting and Investigations

How to Report a Wrongdoing?

Bluefin Resources will investigate any reported Wrongdoing. However, it is difficult to investigate reports which consist of anonymous 'tip-offs'. Therefore, Whistle-blowers are encouraged to identify themselves and to provide all known details of any alleged Wrongdoing to the Whistle-blowing Officer.

If a report is made to the Whistle-blowing Officer that person will report to the CEO of Bluefin Resources, providing only such information as the Whistle-blower has authorised him/her to provide.

What Happens on Receipt of a Report of Wrongdoing?

The Whistle-blowing Officer will:

- Make a detailed record of the report without revealing the identity of the Whistle-blower (in cases where the Whistle-blower is known to the Whistle-blowing Officer), unless the Whistle-blower consents to his/her identity being revealed.
- Liaise with the Director of Bluefin Resources on all matters relating to the investigation of the report.
- Conduct an investigation, or appoint an investigator (who might be another employee of Bluefin Resources, or an external party) to conduct an investigation. Where another employee is appointed as investigator, he or she should not be an employee who works closely with the person being investigated in relation to the Wrongdoing.
- Ensure that an investigation is commenced promptly and discretely.
- Prepare a full report on the findings and recommendations of the investigation, without revealing the identity of the Whistle-blower (in cases where the Whistle-blower is known to the Whistle-blowing Officer).
- Keep the identity of the Whistle-blower confidential, unless it becomes necessary to disclose that person's identity because of pending litigation, or there is some other overriding reason for disclosure; disclosure will be made only after the Whistle-blower has been informed of the need for it.
- Where appropriate, notify the Whistle-blower in general terms of the progress of the investigation, subject to considerations of the privacy of those against whom the allegations have been made.
- Ensure that the person accused of committing the Wrongdoing is given details of the allegation and afforded an opportunity to respond to the allegation before the investigation is concluded.
- Provide a copy of the report of any investigation to the person accused of committing the Wrongdoing.

How Will the Investigation be Conducted?

All reports will be investigated discretely, and only those persons who need to know the fact, and the details, of a report, will be informed of it. Where necessary, Bluefin Resources might employ external resources to assist with an investigation.

Possible Outcomes of the Investigation

An investigation can result in one of three outcomes:

Document: Whistle Blowing Policy		Document Owner: Director – Commercial & Operations	
Document No.: BFGOVPOL02	Version No.: 5	Issue Date: 1/12/2007	Review Date: 20/11/202324
Printed versions of this document are not controlled. Please refer to the Bluefin Resources Intranet for the latest version.			Page: 5 of 8

INTERNAL DOCUMENT

- The Wrongdoing is proven.
- The Wrongdoing cannot be proven, but there is enough suspicion to warrant further ongoing surveillance or investigation.
- The Wrongdoing is unproven.

Both the Whistle-blower (in cases where the Whistle-blower is known to the Whistle-blowing Officer) and the person accused of committing the Wrongdoing shall be informed independently of the result.

Bluefin Resources Code of Conduct (available on Bluefin Resources internal network) will govern what further action Bluefin Resources will take in respect of employees who have been proved to have committed a Wrongdoing; in other cases, the relevant contract shall govern. Please note that where the Wrongdoing involves a possible criminal offence, police involvement will be necessary.

Bluefin Resources will give its full support to employees who are the subject of an investigation where the allegations contained in a report of Wrongdoing are clearly wrong or unsubstantiated. Where an investigation does not substantiate the report, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the investigation must be handled confidentially. In such circumstances, no record of the report or the investigation is to be kept in any human resources or employment related record of the person who was investigated in relation to the alleged Wrongdoing.

Wrongdoings that are Dealt with Under the *Corporations Act 2001 (Cth)*

The Commonwealth Government has made a number of changes to the *Corporations Act (Cth) 2001 (Act)* that impact on how Bluefin Resources must address any reports of Wrongdoing that could involve a contravention, or suspected contravention of the Act.

How to Report a Wrongdoing Under the Corporations Act

A Whistleblower wishing to report a Wrongdoing that could involve a contravention, or suspected contravention of the Act should report their name first to the Whistle-blowing Officer and then provide the substance of the report.

This is important, because the protections guaranteed to Whistle-blowers by the Act will not apply otherwise.

To qualify for protection under the Act, the Whistle-blower must also have reasonable grounds to suspect that Bluefin Resources (or an officer or employee of Bluefin Resources), has, or may have, contravened the Corporations legislation (which includes both the Corporations Act and the ASIC Act.) The disclosure must also be made in good faith.

Actions Following Receipt of Report of Wrongdoing under the Corporations Act

Provided the Whistle-blower has first given the Whistle-blowing Officer their name, the Whistle-blowing Officer may where relevant:

- Make a detailed record of the report; and
- Provide the report to ASIC, APRA or the Australian Federal Police.

Reports to the above can occur without asking for the whistle-blowers permission. However, the identity of the whistle-blower may not be disclosed to another person, unless permission is given by the whistle-blower.

Document: Whistle Blowing Policy		Document Owner: Director – Commercial & Operations	
Document No.: BFGOVPOL02	Version No.: 5	Issue Date: 1/12/2007	Review Date: 20/11/202324
Printed versions of this document are not controlled. Please refer to the Bluefin Resources Intranet for the latest version.			Page: 6 of 8

INTERNAL DOCUMENT

Malicious Reports

If, at the conclusion of an investigation (either internally, or by the appropriate authorities), it is concluded that the Whistle-blower did not act in good faith, that is, reasonably believing the contents of the report to be true, Bluefin Resources may respond in accordance with Bluefin Resources' employment policies in the case of employees. In other cases, the relevant contract shall govern.

Report a Wrongdoing

All communication and reports should be directed in writing to:

The Whistleblowing Officer
Bluefin Resources Pty Ltd
Level 43, Australia Square, 264 – 278 George St, Sydney, NSW 2000

6. RESPONSIBILITIES

The responsibility of implementing this policy rests with the CEO and the Whistle-blowing Officer (who is the Director Commercial & Operations).

7. COMMUNICATION

This policy will be made available on SharePoint, local and restricted networks and communicated to all workers via the inductions and/or training (as required).

8. COMPLIANCES, BREACHES, AND DISCIPLINARY ACTIONS

Applicable disciplinary procedures shall occur if a work to whom this document applies breaches this procedure or any of its related policies / procedures.

9. DOCUMENT CONTROL

Approval Authority	Chief Executive Officer
Document Owner	Rachel West – Director Commercial & Operations
Approval Date	6/11/2023
Effective Date	1/12/2007
Review Date*	6/12/2024

* Unless otherwise indicated, this document will still apply beyond the review date.

10. APPROVAL

Document: Whistle Blowing Policy		Document Owner: Director – Commercial & Operations	
Document No.: BFGOVPOL02	Version No.: 5	Issue Date: 1/12/2007	Review Date: 20/11/202324
Printed versions of this document are not controlled. Please refer to the Bluefin Resources Intranet for the latest version.			Page: 7 of 8

INTERNAL DOCUMENT



Signature of Chief Executive Officer

DATED: 6/1/2023

Revision History	December 2007	New Policy
	August 2011	Review & update based on changes in legislation
	June 2014	Updated document owner, approvals and responsibilities
	June 2016	Updated approvals titles
	October 2023	Updated – what was updated? Or review and no changes

How to report using SpeakUp

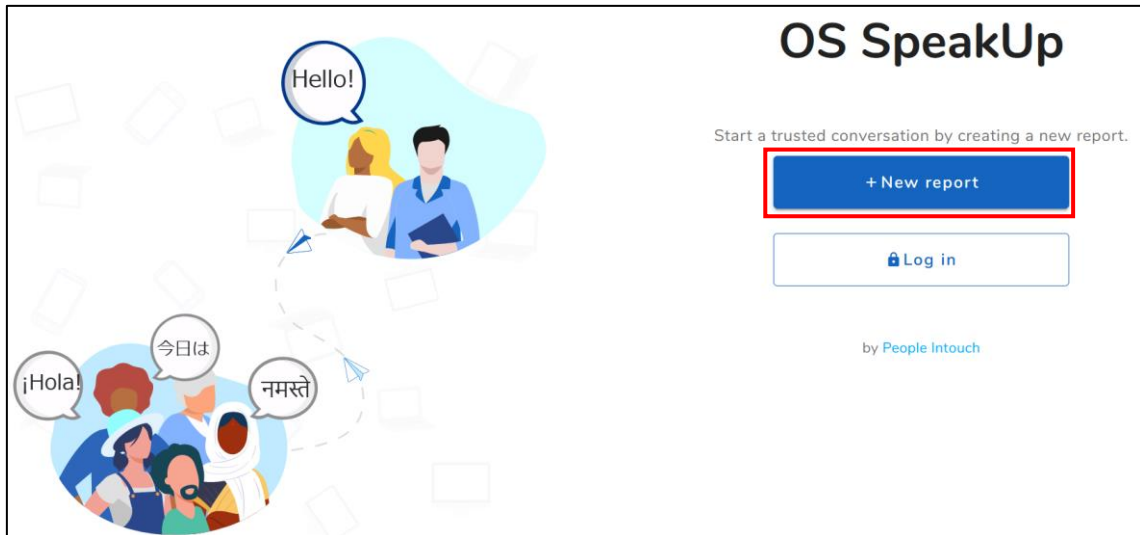
For reporters

OUTSOURCING Inc.
Version 1.0
25 September 2023

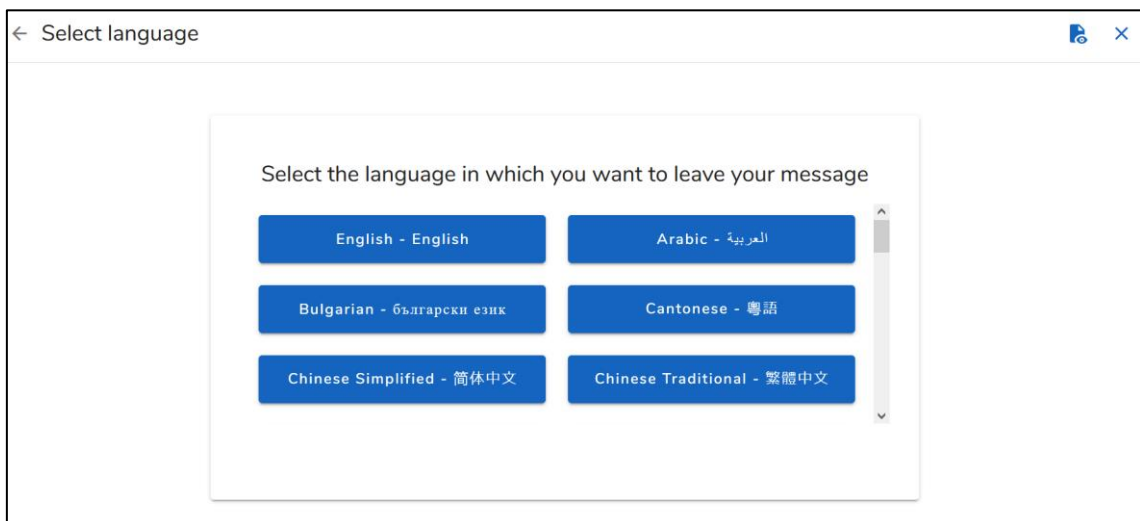
1. How to send a report by web

Go to the webpage with the URL or QR code shown in the last page.

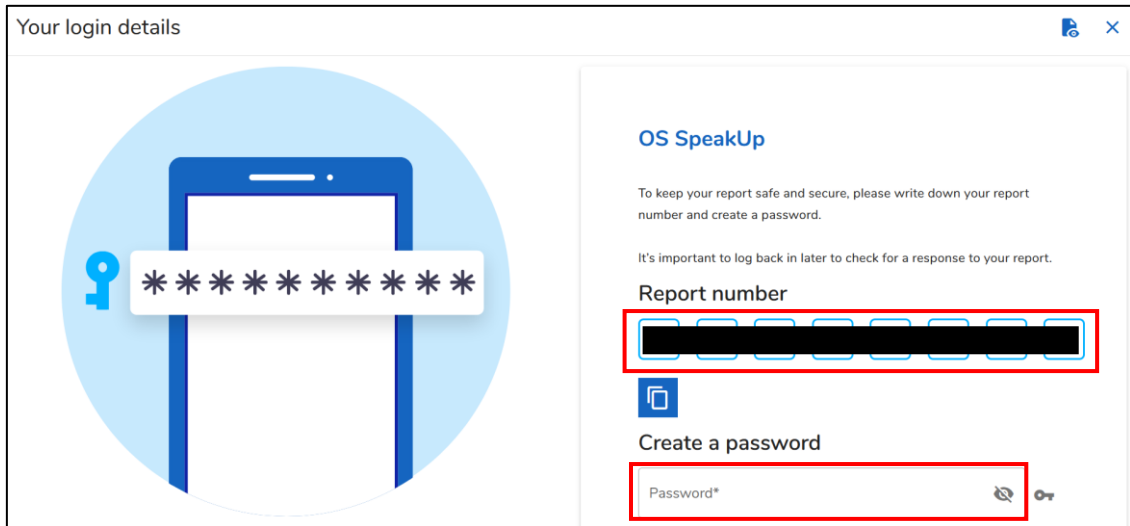
Click on “New report”.



Select the language you want to use.



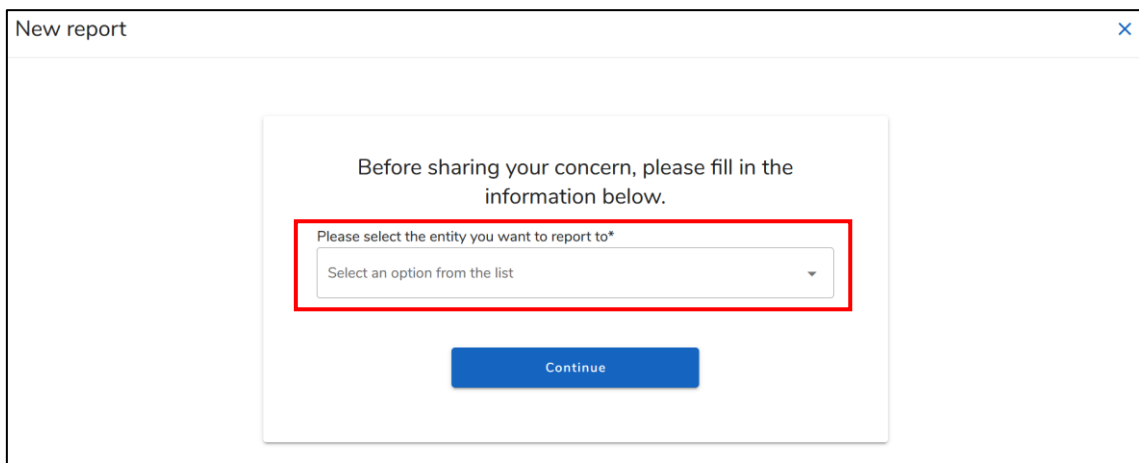
Note down your report number and create your password. You will need the report number and the password in order to later check the response from the organization.



Please choose the entity you want to report to.

*Reports to OUTSOURCING Inc. ("HQ") will be received by HQ legal department. If reasonable based on the content of the report, report may be shared with the relevant entity for investigation, etc.

*Reports to other entities will be received by the recipient(s) set by the entity or group and also viewed by HQ legal department.



Type your message.

New message 🔗 ✕

Language: English | For example: what, when, where?

Type your message here...

📎

Scroll down and press “Send message”.

12 / 50000

➤ Send message



If you want to be notified of a response, leave your e-mail.

Thank you for sharing your concern.
You can expect a response within one week.
Your report number is: [REDACTED]

Never miss a reply
To be notified of a reply to your report, leave your email.
We don't share your email address with your organisation.

Receive notification emails

Exit SpeakUp

You will be asked to type the verifying code sent to the e-mail address.

Verify your email

Check your inbox before leaving this page.
Enter the 6-digit code here:

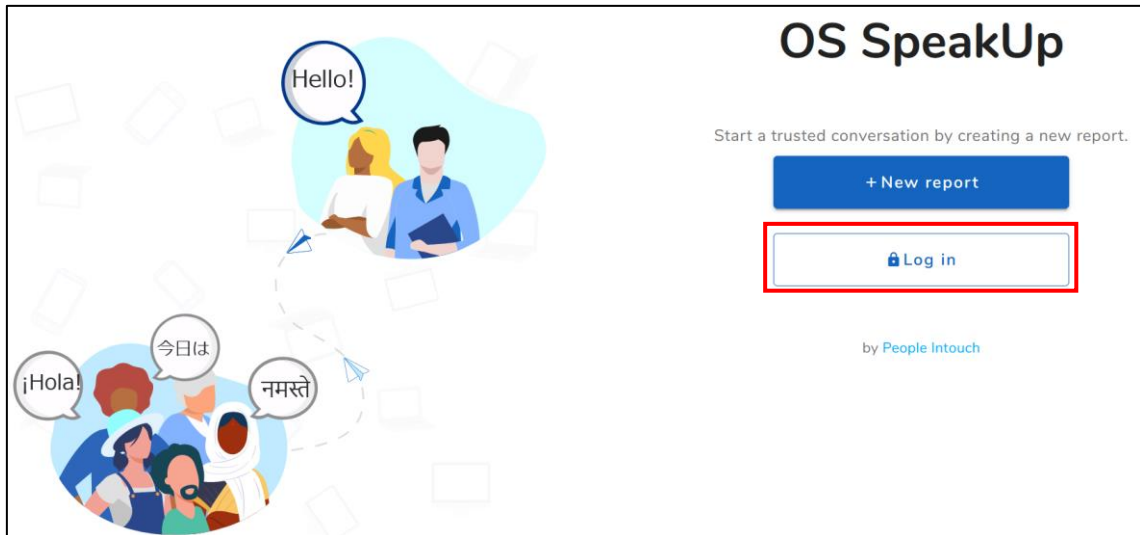
6-digit code* Verify

Can't find the email?
[Leave email again](#)

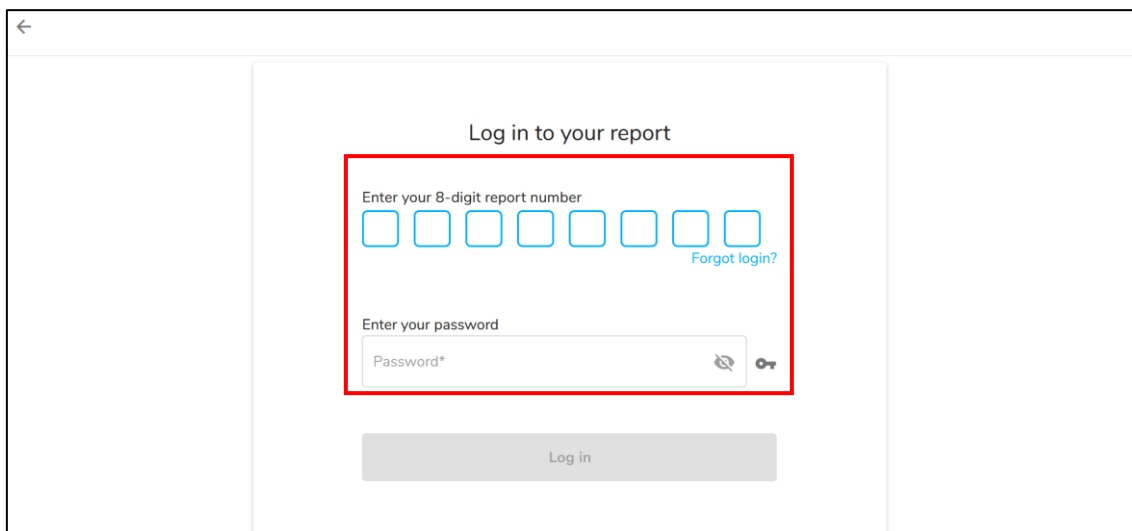
1.2 How to check messages from organization

To check messages from the organization, go to the webpage and click “log in”.

*Initial response could be expected within 7 days.



Enter your report number and password.

The image shows a login form titled "Log in to your report". It is enclosed in a red rectangular border. The form has two main input sections. The first section is labeled "Enter your 8-digit report number" and contains eight empty square boxes for digits, with a "Forgot login?" link to the right. The second section is labeled "Enter your password" and contains a text input field with the placeholder "Password*", an eye icon for toggling visibility, and a key icon. Below these input fields is a grey "Log in" button.

Read the response from the organization and send a new message if necessary.

2. How to send a report by phone

Dial the phone number shown in the last page for the country that you are located in. Add and/or delete numbers in accordance with local rules since some phone numbers are shown with country code.

*Please note that not all countries are covered. If you cannot find the phone number, please report via web.



Enter the organization code shown in the last page.



Select your language.



Note the unique report number you receive. Choose a 4-digit PIN code. You will need the report number and the 4-digit PIN in order to later hear the response from the organization.



Speak your message after the tone.



Call back with your report number and PIN to check for a response. Initial response could be expected within 7 days.

*Reports by phone will be received by the legal department of OUTSOURCING Inc. (you will not be able to choose which entity to report to). If reasonable based on the content of the report, report may be shared with the relevant entity for investigation, etc.

OUTSOURCING Inc.
SpeakUp access details

Please make a report of any illegal practices, unethical conducts, etc.

Go to the webpage with the URL or QR code or call the phone number for your location. You can make a report anonymously and in your local language.

Organization code
107703

URL
https://os.speakup.report/os



Country	Phone number	Phone instructions
Australia	0061282846262	Number: +61 2 8284 6262 Call charged at local rate
Belgium	080089326	Freephone: 0800 89 326
Brazil	00551147008838	Number: +55 (11) 4700 8838 Call charged at local rate
Bulgaria	8002100645	Freephone: 800 210 0645
Cambodia	1800209867	Freephone: 1800 209 867
Chile	0056224835917	Number: +56 22 483 5917 Call charged at local rate
China	108001523042	Freephone (via China Telecom): 1080 0152 3042
China	108008522221	Freephone (Via China United Network): 1080 0852 2221
China	4001201842	Country wide number with no supplier restriction: 400 120 1842 Call charged at local rate.
Colombia	00576012421247	Number: +57 601 242 1247 Call charged at local rate
Croatia	08007745	Freephone: 0800 7745
Czechia	800050833	Freephone: 800 050 833
Ecuador	1800001432	Freephone: 1800 001 432
France	0805543753	Freephone: 080 554 3753
Germany	08001818952	Freephone: 0800 1818 952
Guam	18338096777	Freephone: 1833 809 6777
Hungary	0680984589	Freephone: 06 809 845 89
India	0008000503159	Freephone: 0008 0005 03159
Indonesia	00622180630074	Number: +62 21 8063 0074 Call charged at local rate
Ireland	1800800636	Freephone: 1800 800 636
Lithuania	880030366	Freephone: 8800 30366
Malaysia	0060377243136	Number: +60 3 7724 3136 Call charged at local rate
Moldova, the Republic of	080060016	Freephone: 080 060 016
Netherlands	0031107007503	Number: +31 10 700 75 03 Call charged at local rate
New Zealand	006499135892	Number: +64 9 913 5892 Call charged at local rate
Peru	080074535	Freephone: 0800 74535
Poland	00800012953	Freephone: 0080 0012 953
Romania	0800400653	Freephone: 0800 400 653
Singapore	006564037051	Number: +65 6403 7051 Call charged at local rate
Slovakia	0800113418	Freephone: 0800 113 418
Sri Lanka	0094720910370	Number: +94 (72) 091 0370 Call charged at local rate
Switzerland	0800005691	Freephone: 080 000 5691
Thailand	006628449693	Number: +66 2 844 9693 Call charged at local rate
Tunisia	0021631300338	Number: +216 31 300 338 Call charged at local rate
United Arab Emirates	80004440408	Freephone: 800 0444 0408
United Kingdom	08000224118	Freephone: 080 0022 4118
United States of America	0016692887154	Number: +1 (669) 288 7154 Call charged at local rate
Viet Nam	008419003271	Number: +84 1900 3271 Call charged at local rate