

# WHISTLEBLOWER POLICY

## PURPOSE

Lodestar is committed to ensuring that the Company and its controlled entities (“the Group”), and all its officers and employees, act at all times in compliance with all laws and in compliance with Lodestar’s Code of Conduct.

Lodestar recognises that any genuine commitment to detecting and preventing illegal and other undesirable conduct must include, as a fundamental cornerstone, a mechanism whereby employees and others can report their concerns freely and without fear of repercussion.

This policy provides such a mechanism and encourages the report of such conduct.

## BENEFITS

This policy aims to achieve the following benefits for the Group:

- a) More effective compliance with relevant laws;
- b) More effective fiscal management;
- c) A healthier and safer work environment through the reporting of unsafe practices;
- d) More effective management;
- e) Improved morale within the Group; and
- f) Enhanced perception and the reality that the Group is taking its governance obligations seriously.

## APPLICATION

This policy applies to all employees, officers and contractors of the Group, whether full time, part time, casual or any level of seniority, wherever employed.

## WHAT SORT OF CONCERNS SHOULD BE REPORTED

All employees are encouraged to report any genuine matters or behaviours that they honestly believe contravene Lodestar’s Code of Conduct, the Company policies, or any laws and regulations. For the purposes of making a report under this Policy, matters may include any actual or suspected:

- a) Conduct or practices which are illegal or a breach of any law;
- b) Breach of any of the Company’s policies;
- c) Corrupt activities;
- d) Theft, fraud or misappropriation;
- e) Significant mismanagement or waste of funds or resources;
- f) Abuse of authority;

- g) Serious harm to public health, safety or environment or to the health and safety of any Company employee; or
- h) Any action taken out against, or harm suffered by, an employee as a result of making a report under this policy.

## **HOW CAN A MATTER BE REPORTED**

If you become aware of any matter or behaviour which you consider contravenes Lodestar's Code of Conduct, Lodestar's policies, the law or any regulations, then you should:

- a) Take the matter up with your immediate supervisor or manager; or
- b) Report the matter to a more senior manager, or the Company Secretary.

In instances where you wish to remain anonymous, contact the Chair of the Board where you can raise your concerns privately.

## **WHAT HAPPENS AFTER A REPORT IS MADE**

All reported concerns will be investigated appropriately and where appropriate feedback regarding the investigation's outcome will be provided to you.

The necessary course of action will be taken in response to a report and if no action is taken you will be given an explanation.

Your identity and the fact that you have made a report and the contents of that report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review.

The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

## **WHAT HAPPENS TO YOU**

You will not be discriminated against or disadvantaged in your employment with the Company for making a report in accordance with this policy, nor will you receive reprisals due to your actions in making a report.

The Company will take all reasonable steps to ensure that adequate and appropriate protection is being provided to those who, in good faith, make a report. This protection applies if the matter is proven or not, regardless of whether it is reported to the external service provider.

Whistleblowing is not about airing a grievance. It is about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith, or is found to be malicious, deliberately misleading, or frivolous, you may be subject to disciplinary action which may include termination of your employment.