

## **OZ Minerals Whistleblower Policy - summary**

### **1. Introduction**

OZ Minerals Limited is committed to fostering a culture of compliance, ethical behaviour and good corporate governance that encourages the reporting of improper, unlawful and unethical behaviour.

The Whistleblower Policy is a mechanism by which staff, contractors and consultants can confidently and anonymously, report unacceptable conduct and voice concerns in a responsible and effective manner, without being subject to victimisation, harassment or discriminatory treatment.



### **2. Purpose**

The purpose of this policy is to help detect and address unacceptable conduct and make employees aware that the reporting of such conduct can be made in good faith through OZ Mineral's reporting channels.

### **3. Who does it apply to?**

The policy applies to all directors, employees (full time, part time, casual), contractors and consultants ("OZ Minerals person") of OZ Minerals and its subsidiaries.

### **4. What unacceptable conduct includes**

- A criminal offence.
- Breaching a law or legal obligation in Australia and overseas.
- Behaviour involving danger to the health or safety of any individual.
- Damage or potential damage to the environment.
- Unlawful discrimination.
- Substance abuse.
- Harassment or bullying.
- Misuse of company information.
- Workers compensation fraud
- Corruption, involving:
  - Conflict of interest in purchasing or sales schemes etc.
  - Bribery involving kickbacks, bid rigging etc.
  - Illegal Gratuities.
  - Blackmail
- Asset Misappropriation, involving:
  - Theft of cash on hand
  - Fraudulent Disbursements including billing schemes, personal purchases, payroll schemes, ghost employees, commission schemes, falsified wages, expenses reimbursement including overstated and fictitious expenses, cheque tampering, false voids and refunds.
  - Inventory and other Asset theft, misuse, personal use, false transfers, false sales and shipping, false purchasing and receiving.

- Fraudulent Statements, involving
  - Financial including over or under statement of assets or revenue, fictitious revenue, false time records, concealing liabilities, improper asset valuations.
  - Non Financial including employee credentials, internal or external documents, compliance statements.

## 5. Disclosure Procedure

OZ Minerals has established various channels for the reporting and management of employment and business related matters. In the first instance these issues should be raised with your Direct Supervisor, Manager or Company Secretary (Whistleblower Investigation Officer). Please see Item 6 below for guidance. If employees wish to remain anonymous they can also use OZ Minerals independent disclosure line operated by STOPline.

## 6. Making a Disclosure

Issues that are considered unacceptable conduct can be raised confidentially with the disclosure line or the Whistleblower Investigation Officer.

OZ Minerals has appointed STOPline as the independent disclosure line to ensure best practise and the highest level of independence in the receipt and management of concerns relating to improper conduct.

Disclosures can be made confidentially or anonymously to STOPline from all countries in which OZ Minerals operates as follows:

**Telephone:**  
**within Australia            1300 30 45 50**  
**International: 61 3 9811 3275 (Reverse Charges)**

Alternatively, a person may forward any correspondence with full details of the alleged dishonest practice or improper behaviour, including a reference to OZ Minerals in a letter to the following address:

**OZ Minerals Limited**  
**C/o The STOPline**  
**Locked Bag 8**  
**Hawthorn VIC 3122**  
**AUSTRALIA**

A disclosure may also be made by Facsimile, as follows:

**OZ Minerals Limited**  
**C/o The STOPline**  
**(03) 9882 4480 (within Australia)**  
**61 3 9882 4480 (International)**

Finally, a disclosure may be made by confidential email, by sending a report to the following email address:

**[OZminerals@stoline.com.au](mailto:OZminerals@stoline.com.au)**

## 7. Language

As the OZ Minerals community covers more than 1 indigenous language, where an individual is not confident in making a disclosure in English, a confidential email, letter or fax in their native language is welcome.

To ensure accuracy and confidentiality, STOPline will engage a court appointed translator for the purpose of ensuring accuracy of the translation before review.

Telephone disclosures can also be made to STOPline who will arrange an interpreter service.

## 8. Investigation Procedure

Where a matter has been referred to the Company Secretary (Whistleblower Investigation Officer) an investigator will be appointed to carry out the investigation. This investigation will be carried out as quickly and thoroughly as possible so that recommendations arising from the conclusions can be actioned at the earliest time.

Where a matter is referred to STOPline it will be handled by a trained STOPline interviewer who will quickly determine the veracity of any disclosure.

An investigator will be appointed and findings referred to the Company Secretary or Managing Director & CEO.

Where a person makes a disclosure in good faith he/she may remain anonymous to OZ Minerals Limited and receive statutory protection (if required).

## 9. Complaints and Grievances Summary Guide

<b>Problem</b>	<b>Initial Contact</b>	<b>Other Options</b>
Unacceptable conduct or detrimental action	The STOPline	Company Secretary (Whistleblower Investigation Officer)
Workplace conflicts or grievances	Supervisor or Manager	Human Resources
Equal opportunity concerns	Supervisor or Manager	Human Resources
Occupational Health & Safety	Supervisor or Manager	Human Resources

## 10. Guidance

Employees are encouraged to read OZ Minerals Whistleblower Policy which is available on the Company's intranet site.

If you then have further queries regarding the Whistleblower Policy please contact

Francesca Lee  
General Counsel & Company Secretary  
OZ Minerals Limited  
Tel: 61 3 9288 0425