	STANDARD POLICY	Document ID	TNCL-OHS-POL-0007
		Document owner	Human Resources Manager
	WHISTLEBLOWER POLICY	Revision	00
		Approve Date	13 th January 2026

WHISTLEBLOWER POLICY

The Company is committed to conducting its business with honesty and integrity. We expect all staff to maintain high standards in accordance with our Code of Conduct.

All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur. The Company:

- encourages you to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- will provide you with guidance on how to raise those concerns.
- reassures you that you can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.


This may include:

- criminal activity.
- failure to comply with any legal, regulatory or professional obligation.
- miscarriages of justice.
- danger to health and safety.
- damage to the environment.
- bribery, financial fraud or mismanagement.
- breach of our internal policies and procedures, including our Code of Conduct.
- conduct likely to damage our reputation or financial wellbeing.
- unauthorised disclosure of confidential information.
- negligence.
- the deliberate concealment of any of the above matters.

A whistleblower is anyone who raises a genuine concern relating to any of the above. Concerns related to suspected wrongdoing should be reported under this policy.

Personnel Responsible for the Policy

The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

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All people are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. This policy should not be used for complaints relating to your personal circumstances, such as the way you have been treated at work. In such cases you should speak to HR.

Raising A Whistleblowing Concern

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Chairperson. However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact our confidential telephone hotline. Contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will make a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

If you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone to investigate your concern to know your identity, we will discuss this with you.


We do not encourage you to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Chairperson or the Whistleblowing hotline and appropriate measures can then be taken to preserve confidentiality.

Investigation And Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

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We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

The Board will also be informed of any whistleblowing concerns which are raised.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

The law recognizes that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting concern to anyone externally.


Protection And Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistleblowers must not suffer from any detrimental treatment because of raising concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising concern. If you believe that you have suffered any such treatment, you should inform the Chairperson immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

Please raise such issues on one of the following channels:

- Submission electronically via the Tembo Nickel Website.
- By phone on the whistleblower hotline: USA: 800-916-7037 o Para Español: 855-765-7249 o En Français: 877-591-3211 Canada: 800-916-7037 o En Français: 877-591-3211 UK: 0800-652-3673 Australia: 180-081-0721 Germany: 0800-180-2137 France: 0800-914-677 China: 400-120-0690 Japan: 053-112-2792 You will be prompted to enter the company identifier, please enter: 596

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03/06/2026

Benedict Busunzu
CEO - Tembo Nickel






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Final Audit Report

2026-06-03

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