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# ROCKFIRE RESOURCES PLC WHISTLE BLOWING POLICY

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## 1. Introduction to Rockfire Resources plc's Whistleblowing Policy

This Whistleblowing Policy has been developed to enable any individual to raise a concern they may have about a malpractice or impropriety in a safe way, without feeling they may be subject to harassment, or even that they are being disloyal to friends or colleagues.

Rockfire Resources plc, including its subsidiary, BGM Investments Pty Ltd, are committed to attaining the highest possible standards of quality, integrity, openness and accountability in all of its practices. It can only do this with the help of its employees, contractors and sub-contractors.

Rockfire Resources plc and BGM Investments Pty Ltd would encourage anyone affected to raise any genuine concern at the earliest opportunity, rather than ignore it or feel that they have nowhere to go.

This policy explains the routes open to all persons working at or for Rockfire Resources plc or BGM Investments Pty Ltd, including employees, temporary workers, agency staff and people working with or for sub-contractors.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by Rockfire Resources plc or BGM Investments Pty Ltd, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. It is reasonable to expect workers to follow this policy rather than air their complaints outside Rockfire Resources plc or BGM Investments Pty Ltd.

## 2. Scope

The UK public Interest Disclosure Act (PIDA) 1998 provides protection for workers who reasonably believe that they are acting in the public interest and relates to one of the categories listed below.

This Whistleblowing Policy is designed to enable all employees, contractors and sub-contractors to raise, to a senior level at Rockfire Resources plc or BGM Investments Pty Ltd, any concerns or issues they may have. The policy covers specific concerns that are deemed to be in the public interest and relate to malpractice and impropriety, such as:

- a criminal offence that has been committed, is being committed, or is likely to be committed;
- unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and/or sensitive information;
- a person has failed, is failing, or is likely to fail to comply with any legal obligation to which he/she is subject;
- a miscarriage of justice that has occurred, is occurring, or is likely to occur;
- the health or safety of any individual has been, is being, or is likely to be, endangered;
- the environment has been, is being, or is likely to be, damaged;
- information tending to show any of the above is being, or is likely to be, deliberately concealed.

It should be noted that Whistleblowing does not cover concerns where there is no public interest element such as a concern about your own employment or related matters. For Rockfire Resources plc or BGM Investments Pty Ltd employees there are existing grievance procedures relating to employment matters.

## 3. Assurances

### **Protection**

Where individuals have come forward to disclose their concerns, which have been made in good faith and in the reasonable belief that it demonstrates malpractice or impropriety, and if it is made to an appropriate person (see information below), then they will be offered protection under this policy.

Rockfire Resources plc and BGM Investments Pty Ltd do not tolerate any harassment, victimisation or bullying and will take steps to protect those individuals who raise a concern in line with this policy and in good faith.

Any individuals found to be making vexatious, bogus or malicious disclosures will not be offered that protection and may be subject to further action being taken against them.

No protection from internal disciplinary procedures will be afforded to individuals who choose not to follow this procedure.

### **Confidentiality**

We strongly encourage individuals to give their personal details if a disclosure is made. Rockfire Resources plc and BGM Investments Pty Ltd will treat any information given by that individual as sensitive and confidential.

Any requests for anonymity will be respected as far as possible, but such a request may make the disclosure less credible or make it far more difficult for the matter to be investigated fully. It may also be necessary for personal details to be disclosed to the authorities if the matter requires their involvement.

## **4. How to raise a concern**

Concerns should be reported to an appropriate person, normally the immediate manager in the first instance. If that is inappropriate due to the sensitivity or seriousness of the issues involved, then it may be reported to the Chairman, Mr Gordon Hart or Mr Ian Staunton, Chairman of the Audit Committee.

If you think the matter has not been dealt with properly by your immediate manager you may report the concern directly to the Chairman, Mr Gordon Hart or Mr Ian Staunton, Chairman of the Audit Committee.

If you are a contractor or sub-contractor or an employee of a supplier to Rockfire Resources plc or BGM Investments Pty Ltd, then the report can either be made to a manager in the company you are contracted to or work for, or if the issue relates to that relationship, you can contact Rockfire Resources plc or BGM Investments Pty Ltd directly. Details are listed below.

Concerns can be raised either verbally or in writing and should be made at the earliest opportunity. You will need to be able to provide background to the issue, relevant dates and the reason for the concern. While you are not required to prove beyond doubt that any allegation made is true, you will be required to demonstrate that there are reasonable grounds for the allegation.

If you have raised a concern and the matter is deemed to be more appropriate to the Group's Grievance Policy, then you will be advised as such.

## 5. How the matter will be dealt with

The matter will be passed to an Investigating Officer, which is normally the Chairman, Mr Gordon Hart or Mr Ian Staunton, Chairman of the Audit Committee. They will review the matter as the Investigating Officer as soon as is reasonably practicable and consider what action is the most appropriate to take; an informal review, internal enquiry or a formal investigation.

Where it is felt necessary to involve the police due to evidence of a criminal nature, the police will be given all information already obtained. The Investigating Officer will also ensure that any internal investigation does not obstruct any police investigation.

The Investigating Officer will make a judgement on the validity of the complaint detailing the matters in a written report, which will then be placed before the Chief Executive Officer or the Board, as appropriate. The decision will then be made by them as to whether the complaint is justified and what actions are to be taken.

The individual who made the initial disclosure will be kept informed as much as is reasonably possible and, where appropriate, will be notified of the outcome.

While Rockfire Resources plc and BGM Investments Pty Ltd cannot guarantee that they or the Investigating Officer will respond to all matters in the way that you might wish, including the timescales – investigations can vary depending on the complexity of the matters and, therefore, no timescales can be subject to a fixed timetable – the matter will be handled fairly and properly, and by using this policy you will help us to achieve this.

## 6. Who to contact

In the first instance, you should contact your manager. If you wish to raise the issue directly with Rockfire Resources plc's Chairman, Gordon Hart, you can email him at [gordon@rockfireresources.com](mailto:gordon@rockfireresources.com) or Ian Staunton at [ian@rockfireresources.com](mailto:ian@rockfireresources.com)

If you are a contractor or sub-contractor you can also go direct to Mr Gordon Hart or Mr Ian Staunton if you are unable to raise the matter with anyone else.

Your concern will be treated in confidence and as outlined in this policy.

This Whistleblowing Policy will be monitored and reviewed on an annual basis or as required. It has been approved and authorised by:

Approved by the Board 11 March 2021