

## Whistleblower Policy

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## 1.0 POLICY

Lycopodium (including its subsidiaries) is committed to conducting all of its business activities fairly, honestly with integrity, and in compliance with all applicable laws, rules and regulations. Its board, management and employees are dedicated to high ethical standards and recognise and support the Company's commitment to compliance with these standards.

Lycopodium promotes an open working environment in which employees are able to report concerns, without fear of retaliatory action, regarding potential unethical, unlawful or undesirable conduct.

The purpose of this policy is to:

- help detect and address wrongdoing and protect employees who report , anonymously or not, actual or suspected wrongdoing
- provide employees with a supportive environment in which they are able to raise sensitive issues of legitimate concern to a confidential point of contact (Compliance Officer)
- provide suitable avenues for reporting of matters that may cause loss or damage Lycopodium's reputation.

Wrongdoing covered by the policy includes any conduct that:

- is dishonest, fraudulent or corrupt
- is illegal
- is unethical, such as dishonestly altering company records or engaging in questionable accounting practices or wilfully breaching Lycopodium's code of conduct or other ethical statements
- may cause financial loss to Lycopodium or damage its reputation
- involves any other kind of serious impropriety.

This policy is not intended to replace other reporting structures such as those for dispute resolution, grievances, discrimination, harassment or bullying except where the issue is of a serious matter where existing reporting systems have failed to process the issue or processed it in an inappropriate, unfair or biased matter.

## **2.0 PROCEDURE**

### **2.1 Reporting Responsibility**

It is the responsibility of all employees to report a wrongdoing, or suspected wrongdoing in accordance with the Whistleblower Policy.

### **2.2 No Retaliation**

No employee who, in good faith, reports a wrongdoing shall suffer harassment, retaliation or adverse employment as a consequence. An employee who retaliates against someone who has reported a wrongdoing in good faith is subject to discipline, up to and including termination of employment. This Whistleblower Policy is intended to enable employees and others to raise serious concerns within Lycopodium.

### **2.3 Reporting Violations**

Lycopodium provides a confidential process enabling employees to share their questions, concerns, suggestions or complaints with a confidential focal point.. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the General Manager - People, or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected wrongdoings to the Lycopodium Limited's Chief Financial Officer, who has authority and responsibility to investigate all reported wrongdoings. For suspected fraud, or when you are not satisfied or uncomfortable with following the Company's open door policy, individuals should contact Lycopodium Limited's Chief Financial Officer directly.

### **2.4 Compliance Officer**

Lycopodium's Compliance Officer is Lycopodium Limited's Chief Financial Officer, who is responsible for investigating and resolving all reported complaints and allegations concerning and, at his discretion, shall advise the Managing Director and/or the Lycopodium Limited Board.

### **2.5 Acting in Good Faith**

Anyone filing a complaint concerning a wrongdoing must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a wrongdoing. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

### **2.6 Confidentiality**

Wrongdoings or suspected wrongdoings may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of wrongdoings or suspected wrongdoings will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **2.7 Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported wrongdoings or suspected wrongdoings. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.