



WHISTLEBLOWER POLICY

1. Purpose and Scope

This Whistleblower Policy (“Policy”) is adopted in accordance with the UK QCA Corporate Governance Code and the AQSE Rulebook. The Company is committed to the highest standards of integrity, transparency, and accountability. This Policy applies to all directors, officers, employees, consultants, contractors, suppliers, and customers (“stakeholders”).

2. Policy Statement

The Company encourages all stakeholders to report any concerns regarding actual or suspected misconduct, breaches of law, or unethical behaviour. Reports may include, but are not limited to:

- Bribery, corruption, or financial fraud
- Mismanagement or misreporting of company performance
- Breaches of legal, regulatory, or professional obligations
- Unauthorised disclosure of confidential information
- Bullying, harassment, or discrimination
- Health, safety, or environmental risks
- Human rights abuses, including modern slavery
- Concealment of any of the above

3. Reporting Procedures

3.1 How to Raise a Concern

Concerns can be raised confidentially via:

- Email to the dedicated whistleblowing address: whistleblowing@marulamining.com
- Secure paper submission at operational sites (forms available in local languages)
- Postal or courier service to the Chairman at the registered office

3.2 Information to Include

- Date(s) and details of the incident(s)
- Names of individuals involved (if known)
- Any supporting evidence

3.3 Anonymous Reporting

- Anonymous disclosures are accepted and investigated where sufficient information is provided.
- The Company encourages whistleblowers to identify themselves to facilitate effective investigation.

4. Investigation Process

4.1 Initial Assessment

- The Chairman and CEO will conduct an initial assessment.
- If either is implicated, the Board will appoint an independent investigator.
- The assessment will determine whether the concern warrants internal or independent investigation.

4.2 Investigation

- Investigations will be conducted promptly, impartially, and confidentially.
- A written report will be prepared, including findings and recommendations.
- Reports may be escalated to the Audit Committee, the Risk Committee and the Environmental and Social Responsibility Committee as appropriate.

4.3 Timelines

Investigations should be concluded within 20 working days, unless an extension is agreed.

5. Protection and Support

- Whistleblowers are protected from retaliation, victimisation, or disadvantage for raising concerns in good faith.
- The Company will maintain confidentiality and process personal data in accordance with UK data protection laws.
- UK employees are protected under the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998) and may seek redress through an employment tribunal if subjected to detriment.

6. False or Malicious Allegations

- Disclosures must be made in good faith and with reasonable belief in their truth.
- Deliberate false or malicious allegations may result in disciplinary or legal action.

7. Reporting and Oversight

The Whistleblowing Officer(s) will report bi-annually to the Audit and Risk Committee and the ESG Committee, summarising:

- Number and nature of concerns
- Outcomes of investigations
- Actions taken and recommendations

8. Communication and Review

This Policy will be published on the Company website and displayed at operational sites. All stakeholders will be made aware of the Policy and its procedures.

The Board will review the Policy annually and update as required.

This Whistleblower Policy was reviewed 22 April 2026.

The Board of Directors approved this Policy on 7 May 2026.