

Whistleblower Policy

Date	Changed	Approved
January 2020	Original adoption	Board
18 February 2022	Update	Board
14 February 2025	Update	Board

Whistleblower Policy

Hillgrove is committed to high standards of integrity, accountability, and ethical conduct throughout its operations and business dealings. This Whistleblower Policy describes the framework and mechanisms that allow and enable persons to report legitimate concerns regarding misconduct, illegal activities, or unethical behaviour in connection with the Company's operations and to ensure that whistleblowers are protected from retaliation. This policy applies to all current and former employees, officers, contractors, suppliers, consultants, and associates of the Company and their relatives.

AREAS OF POTENTIAL MISCONDUCT INCLUDE:

- ▶ Financial misconduct or misrepresentation
- ▶ Breaches of environmental, safety, or health regulations
- ▶ Unethical behaviour or misconduct
- ▶ Breaches of the law or regulatory requirements
- ▶ Any other improper conduct or behaviour that may harm the Company's reputation

OUR COMMITMENTS IN RELATION TO THE WHISTLEBLOWING INCLUDE:

- ▶ Providing systems and processes to enable persons to make representations confidentially to Authorised Whistleblower Officers
- ▶ Maintaining mechanisms to reduce the risk that the eligible whistleblower will be identified from the information contained in a disclosure
- ▶ Protecting whistleblowers from victimisation, harassment, dismissal, or discrimination
- ▶ Undertaking investigations with impartiality, confidentially and in proportion to the nature of the disclosure
- ▶ Reporting relevant matters and concerns to regulatory authorities where prescribed by law
- ▶ Acting swiftly in cases where any non-conformance, or breach, is concerned with whistleblower protections and confidentiality
- ▶ Appropriating disciplinary measures, or legal action, if necessary, where misconduct is substantiated
- ▶ Providing training for all employees, and external persons who provide services to the Company, on the Whistleblower procedure

The implementation and monitoring of this policy and its framework will be overseen by the Hillgrove Board.

R (Bob) Fulker

Managing Director and CEO – Hillgrove Resources