



Whistleblower Policy of Global Mining Guidelines Group (GMG)

The Global Mining Guidelines Group (GMG) facilitates global mining collaboration on solutions to common industry problems, needs and technology through guidelines, white papers and best practices. GMG operates on the principles of inclusivity, collaboration, accessibility and encouragement.

Purpose:

The purpose of this Whistleblower Policy is to establish procedures for the reporting and investigation of concerns or complaints regarding unethical behavior, violations of applicable laws or regulations, or any other wrongdoing within the Global Mining Guidelines Group (GMG). This policy aims to ensure that employees, volunteers, and other stakeholders have a mechanism to report such concerns without fear of retaliation.

Scope

This policy applies to all individuals associated with GMG, including but not limited to employees, volunteers, contractors and suppliers.

Reporting Channels:

GMG encourages individuals to report any concerns or complaints through the following designated channels:

- Direct reporting to the immediate supervisor or manager.
- Confidential Email: operations@gmggroup.org
- Reporting to the CEO or the Board of Directors.

Protected Disclosures:

This policy protects any individual who, in good faith, reports a concern or complaint related to:

- Violation of laws, rules, or regulations in the countries that GMG operates in
- Financial misconduct, including fraud, embezzlement, or misappropriation of funds
- Unethical behavior, such as conflicts of interest, nepotism, or bribery
- Health and safety violations
- Discrimination, harassment, or other violations of employee rights
- Misuse of organizational assets or resources
- Environmental violations
- Any other illegal or unethical activities

Anonymous reports will also be accepted, provided that they contain sufficient information to allow for a reasonable investigation.

Confidentiality:

Reports made under this policy will be treated with the utmost confidentiality to the extent allowed by law and practicality. Confidentiality will be maintained throughout the investigation process to protect the rights of the whistleblower and the individuals involved. However, anonymity cannot be guaranteed, as it may impede an effective investigation.



Non-Retaliation:

GMG is committed to protecting individuals who report concerns or complaints in good faith. Retaliation against whistleblowers is strictly prohibited, and any individual found to have engaged in retaliatory actions will be subject to disciplinary action, up to and including termination. This policy applies not only to direct retaliation but also to any adverse actions, harassment, or intimidation that may deter individuals from reporting concerns.

If a whistleblower experiences any form of retaliation, they should immediately report it to the designated authority. The organization will promptly investigate any such claims and take appropriate action.

Investigation Process:

- **Receipt of Report:** The organization will promptly acknowledge the receipt of a whistleblower report within a reasonable timeframe.
- **Investigation:** The organization will initiate an impartial and thorough investigation into all reports of concerns or misconduct. Investigations will be conducted by competent individuals who have no conflicts of interest with the matter being investigated.
- **Fair Treatment:** The organization will ensure fair treatment of all individuals involved in the investigation, including the whistleblower and the subject(s) of the report.
- **Confidentiality:** All investigations will be conducted with the utmost confidentiality, to the extent reasonably possible, without compromising the investigation process or applicable legal requirements.
- **Communication:** The organization will provide periodic updates to the whistleblower regarding the progress and outcome of the investigation to the extent possible, considering the need for confidentiality and privacy of all involved parties.

False Allegations:

Good Faith Requirement: Whistleblower reports must be made in good faith, meaning the whistleblower genuinely believes the information reported to be true and accurate at the time of reporting.

Intentionally making false allegations or providing misleading information is a serious offense and may result in disciplinary action, up to and including termination of employment or participation in GMG or legal action, as deemed appropriate by GMG.

External Reporting:

If an individual believes that reporting internally would be ineffective or fears retaliation, they may report their concerns to external authorities, such as regulatory agencies or law enforcement, as permitted by law.

Policy Distribution:

This Whistleblower Policy shall be communicated to all employees, volunteers, and stakeholders of GMG. Awareness campaigns will be conducted to ensure understanding and compliance with this policy.

GMG's Commitment:

GMG is committed to maintaining a work environment that encourages ethical conduct, transparency, and accountability. The organization will take appropriate action to address any wrongdoing or violation of policies, ensuring that appropriate corrective measures are implemented.

Policy Review:

This policy will be reviewed every three years to ensure its effectiveness and alignment with changing laws and regulations. Updates and amendments will be made as necessary.

By implementing this Whistleblower Policy, GMG aims to foster a culture of integrity and ethical behavior, allowing individuals to raise concerns or report wrongdoing without fear of reprisal.