

A red geometric graphic consisting of two overlapping triangles, one pointing up and one pointing down, located on the right side of the page.

WHISTLEBLOWER POLICY

POLICY

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Name:	Whistleblower Policy

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1 Purpose

1.1 The purpose of Kamo Copper S.A.'s (hereinafter "Kamo" or the "Company") Whistleblower Policy (hereinafter the "Policy") is to describe the procedures for the intake, receiving/dispatch, investigation, and treatment of reports filed through the Whistleblower dedicated email address or the Whistleblower Hotline accessible through the Company's website, employee portal, or mobile devices, as well as to demonstrate the Company's commitment to preserving the confidentiality of the information obtained during the process and to establish safeguards against retaliation for whistleblowers who file a complaint in good-faith.

2 Scope

2.1 The Whistleblower Policy applies to all employees of the Company, including directors, officers, and authorized spokespersons, as well as all consultants, contractors, advisors, and other persons involved in business with the Company (i.e., all persons working for or with the Company defined as "Covered Persons").

3 Definitions

The definitions and abbreviations applicable to this Policy are detailed in Table 3-1 and Table 3-2.

Table 3.1 Definitions Applicable to Policy

Term	Definition
Anonymity	The unknown identity of the Whistleblower, where the Whistleblower is unspecified, and his/her identity is not known to any employee or the Whistleblower Investigation Officer and the Whistleblower team.
Concern	A situation raised by a Whistleblower about a suspected or factual illegal or unethical conduct or other misconduct by or within the Company, that leads or could lead to a violation of Company's Code of Business Conducts and Ethics, Anti-Bribery and Corruption Policy, HSE Matters, HR Matters, other Company policies, or applicable laws and regulations.
Good faith	Honest intent deprived with any malice that triggers the Whistleblower to believe and report actual or suspicious behaviours that violates the Company's policies or applicable laws and regulations.
Executive Committee	Company's Executive Committee that appoints the WIO (as defined), evaluates and approves the final reports of Whistleblower's investigations taking into account the scope of the investigation, the actions and disciplinary processes tabled by the Whistleblower Team.
Policy Committee	The Company's Committee that reviews and approves the Whistleblower Policy.
Retaliation	Adverse and unlawful action including actual threats or attempts taken against a Whistleblower or any other employee who provides information or who otherwise assists in a preliminary and/or full Investigation as a result of his/her reporting a concern or assisting with the investigation.
Senior Executive Committee (Senior EXCO)	A group within the Executive Committee of the Company that is made of the Managing Director, the Executive Director, the Senior Executive, Finance, and the Senior Executive, Operations.

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Whistleblower	Any person eligible for protection as a Whistleblower under this Policy and applicable law or best practice when they report in good faith a concern in the context of their work-related activities including employees, former employees, candidates, and parties with whom the Company has or might have a business relationship, as well as all other stakeholders.
Whistleblower channels	The channels made available by the Company through which Whistleblowers can report a concern anonymously.
Whistleblower Investigation Officer (WIO)	The Whistleblower Team leader responsible for the overall investigation strategy; sign-off of the investigation plan and final investigation report; and its delivery to the Senior Executive Committee. The Whistleblower Investigation Officer (WIO) role is currently held by the Senior Superintendent II, Governance and Compliance.
Whistleblower Team	The team appointed by the WIO, responsible for implementing and promoting the maintenance of the Whistleblower Policy guidelines; conduct independent and impartial investigations; and prepare the investigations' preliminary and final reports.

Table 3.2 Abbreviations Applicable to Policy

Abbreviation	Definition
EXCO	The Company's Executive Committee
WIO	Whistleblower Investigation Officer

4 Legal Requirements

4.1 Any legal requirement that might be or become applicable to this Whistleblower regime.

5 General

5.1 Speak Up Culture

5.1.1 The Company encourages all employees and third parties who know or suspect that any deviation or irregularity is taking place to report these events in good faith through the Whistleblower channels without being afraid of any kind of retaliation.

5.1.2 The Company is constantly committed to ensuring a safe space for reports where analysis will be carried out in complete impartiality and confidentiality.

5.1.3 All reports will be analyzed and verified, and interactions are carried out with the Whistleblower directly through the dedicated Whistleblower channels.

5.1.4 Actions will be taken to stop deviations and improve processes and the work environment. To guarantee confidentiality, the actions may not be shared with the Whistleblower but may be observed in the day-to-day work.

5.2 Intake

5.2.1 Kamoa instructs employees, third parties, representatives, and citizens in general to file reports through the dedicated Whistleblower channels, immediately after becoming aware of or suspecting any failure to comply with Company's standards guidelines or inappropriate behaviour.

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5.2.2 The objective is to ensure that the investigation is conducted by a specialized team and the deviation, if substantiated, is promptly interrupted and redressed accordingly.

5.2.3 Kamoas Whistleblower channels are available 24/7 via the following:

- Email: whistleblower@kamoacopper.com
- EthicsPoint: A report may also be made through EthicsPoint either by telephone (Click Connect), via the Internet, or on a mobile device (an "EthicsPoint Report").
 - Web Intake Site: <https://secure.ethicspoint.eu/domain/media/en/gui/113887/index.html>
 - Link to EthicsPoint web intake site is also available through:
 - Kamoas Employee Portal
 - Kamoas company Website
 - Mobile Intake Site: <https://kamoacopper.navexone.eu/intake>

The mobile intake site can also be accessed using the QR Code:



- Telephone Hotline: The "Click Connect" feature is available globally. It is a web-based voice call from an EthicsPoint hosted site. This allows reporters to initiate a call directly from a web interface or mobile device with a single click—no need to manually dial a number.

5.2.4 The Whistleblower may file an identified or anonymous report. Even in case of identified reports, the Company commits to restricting the information of the Whistleblower's identity to only those responsible for the investigation.

5.2.5 When filing a complaint, Whistleblowers are encouraged to provide all available information and evidence (if any) in as much detail as possible to increase the effectiveness of the investigation.

5.2.6 After the report is completed, EthicsPoint will assign a unique code called a "report key." The Reporter will be instructed to write down their report key and personal password and to use their report key and password to check their report for feedback or questions by the Whistleblower Team to assist with the investigation.

5.3 Receiving/Dispatch

5.3.1 Kamoas is responsible for ensuring Whistleblower dedicated channels can receive the complaints with confidentiality and security.

5.3.2 Upon receiving a complaint, the Whistleblower Investigation Officer will evaluate its nature and assign it to the appropriate Whistleblower Team to initiate an investigation. Depending on the specifics of the complaint, Whistleblower Team members may be selected from the following departments:

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- Governance and Compliance
- Internal Audit
- Human Resources
- Legal
- Risk Control & Loss Prevention
- Information Technology
- Other department, as required

5.3.3 Concerns that, eventually, implicate members of the Whistleblower Team will be addressed exclusively by the Whistleblower Investigation Officer, who will conduct the investigation alone. This workflow aims to ensure the impartiality of the process, preventing a department or an employee from becoming aware of or carrying out an investigation of themselves (auto-investigation).

5.3.4 Concerns that, eventually, implicate the Whistleblower Investigation Officer will be forwarded to the Company's Senior Executive, Finance with the aim of appointing a new investigator for the case.

5.3.5 Concerns that, eventually, implicate a member of Senior EXCO will be forwarded to KHL's Audit and Risk Sub-Committee for investigation.

5.4 Investigation

5.4.1 Upon receiving the report, the Whistleblower Team defines an investigation plan that may include communication with the Whistleblower, request of additional information, and collection of evidence and, if necessary, hiring specialized third parties. The investigation plan must be approved by the Whistleblower Investigation Officer.

5.4.2 In addition to the Whistleblower Team, which conducts the investigation, the investigation plan may, eventually, require additional employee(s) from other department(s) to support the process, provided that their involvement is indispensable. However, these employees must be kept to a minimum and not be related to the reported incident, to avoid undue interference or influences and preserve the credibility of the process.

5.5 Case Closure

5.5.1 Due to the variety of possible complaints, it might not be possible to determine an exact time frame to close an investigation. However, Kamoia reinforces the commitment to dealing with complaints as soon as possible without compromising the quality and the integrity of the investigation.

5.5.2 At the end of each investigation, the Whistleblower Team prepares a report, which may contain recommendations of disciplinary proceedings or opportunities for improvement. The document is signed by the Whistleblower Investigation Officer and sent to the Senior Executive Committee.

5.5.3 Notwithstanding the previous paragraph 5.5.2, should the subject of the complaint and subsequent investigation involve a Senior Executive Committee member, the investigation reports should be directly shared with the Shareholders' Project Committee.

5.6 Disciplinary Proceedings

5.6.1 If the investigation substantiates the complaint, Kamoia ensures that deviations are promptly interrupted, and the proper disciplinary proceedings are initiated according to the Code of Business Conduct and Ethics and applicable Disciplinary Measures procedure.

5.7 Reporting

5.7.1 The Whistleblower Investigation Officer is responsible for periodically reporting the complaints received to:

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- **Senior Executive Committee:** final report of each complaint received.
- **Policy Committee:** quarterly summary of reports/investigations and annual benchmark report.
- **KHL Audit and Risk Sub-Committee:** quarterly summary of reports/investigations and annual benchmark report.
- **Stakeholders:** disclosure of indicators related to complaints received.

6 Confidentiality and Protection to Whistleblowers

6.1 Kamoia will not tolerate any act that directly or indirectly harms the Whistleblower who, on suspicion or certainty, reports in good faith facts and conducts that violate the Company’s Values, Purpose, and Mission; Code of Business Conduct and Ethics; Kamoia’s policies, standards, procedures, or applicable laws.

6.2 Retaliation, persecution, and/or exposure of people and companies/institutions with the intention of denigrating their image and violating their reputation will not be allowed and may be opened to further investigations and disciplinary proceedings if averred.

6.3 The Whistleblower is guaranteed the right to anonymity in the reports conveyed through the Whistleblower channels, but should they decide to reveal their identities, they will be treated with total confidentiality and their identities will be preserved, free from retaliation.

6.4 Employees who cooperate in the investigation of possible violations and Whistleblowers who, in good faith, contribute to information regarding any misconduct, will not suffer any type of retaliation, sanction, and/or any form of embarrassment or discrimination.

6.5 Retaliation against a good-faith whistleblower or against persons who collaborate with an investigation is a violation of the Code of Business Conduct and Ethics and the person responsible for retaliation, regardless of their position within the company, will be subject to disciplinary action which could include the discharge from the Company.

6.6 However, a false or bad-faith report may lead to the disciplinary proceedings provided for in Kamoia’s Code of Business Conduct and Ethics and applicable law and regulations.

7 Exceptions

7.1 There are no exceptions to this Policy.

8 Policy Review

8.1 This Whistleblower Policy is subject to review every two years or whenever there are critical changes that impact the Whistleblower regime.

9 References

Doc. No.	Document Title	Location
1013-PL-27-006	Code of Business Conduct and Ethics	Employee Portal
1013-PL-27-008	Anti-Bribery and Corruption Policy	Employee Portal

10 Annexures





No.	Annexure Description	File

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11 Document Change History

Revision Number	Date of Change	Reason for Change	Paragraph Number (If Relevant)
000	2024/03/05	New document	
001	2025/07/21	<ul style="list-style-type: none"> Expanded definition of “Concern” Updated whistleblower reporting channels Expanded on dispatch of complaints Added requirement to report on whistleblower activity to the KHL Audit and Risk Sub-Committee 	Table 3.1 5.2.3 5.3.2 5.7.1

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