



WHISTLEBLOWER POLICY

Strandline Resources Limited (“**Company**”) operates to the highest levels of integrity and honesty and its recruitment philosophy is to select employees who can meet or exceed its expected standards.

However, regardless of how much care is taken in recruiting employees or contractors, it is recognised that as the Company’s business becomes larger and more complex it may sometimes be exposed to the unfortunate actions of a few misguided individuals who may take it upon themselves or within a colluding group to introduce unsafe, corrupt, fraudulent or illegal practices into the Company’s operations.

The introduction of these practices may expose the contractors, employees and Directors of Strandline Resources to prosecution, penalties and/or jail as many of these practices may be prohibited by legislation in one or more jurisdictions. They may also impact the Company’s global reputation.

To ensure that it can efficiently and effectively identify and resolve any unsafe, corrupt, fraudulent or illegal practices the Company has in place a system where an individual can bring notice of any failures in the organisation to the Managing Director (“**MD**”) who, as a Director and Manager of the Company, is required and obliged to investigate and resolve all and any reports. The procedure for reporting any issues is as follows:

1. An individual will contact the MD with details (what and who) of the potential unsafe, corrupt, fraudulent or illegal practice. This can be done by letter, fax, e-mail or telephone call. ***The approach can be anonymous if preferred.***
2. The MD will instigate an investigation according to the MD’s assessment of the situation and will involve personnel who are considered to be not directly involved or close to the issue.
3. If the issue is proven to exist, and once the issue is resolved, the organisation will be informed of the incident and the resolution. ***Under no circumstances will the MD release to any other person in the organisation the name of the individual who brought the matter to the MD’s attention.***
4. Once the matter is resolved, the individual who brought the matter to the attention of the MD may be considered for a reward – unless they brought the matter anonymously, which in this case they cannot be rewarded. This will be at the discretion of the MD.
5. The MD may consider putting in place appropriate procedures, checks and balances to ensure that the matter does not occur again and will counsel and brief all direct and indirect managers in the areas of the matter to ensure that they can prevent a recurrence of the matter.



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Under absolutely no circumstances will the individual who brought the matter to the attention to the MD be subject to any punishment or persecution (within the limit of the laws and company policies) regardless of any outcome of the matter. The adherence to this philosophical principle is the key to the application of this policy.

Application

The Managing Director is accountable to the Board of Directors for ensuring that this policy is implemented. This policy will be reviewed on a yearly basis.

This Policy applies to all staff, contractors and joint venturers engaged in activities under Strandline's operational control.

Approved by:	Luke Graham	Approval Date:	26 September 2019
Position:	Managing Director	Review Date:	26 September 2019