

Whistleblower Policy

1. Purpose of this policy

Carnaby Resources Limited (**Carnaby** or the **Company**) and its related bodies corporate (together the **Group**) is committed to the highest standards of conduct and ethical behaviour in all of our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

Carnaby encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Carnaby's businesses and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal. The policy is also designed to:

- help deter wrongdoing;
- ensure disclosures are dealt with appropriately and on a timely basis;
- provide transparency around the Company's framework for receiving, handling and investigating disclosures;
- support the Company's values and code of conduct;
- support the Company's long-term sustainability and reputation;
- meet the Company's legal and regulatory obligations; and
- align with the ASX Corporate Governance Principles and Recommendations and relevant standards.

The Whistleblower Policy is an important tool for helping Carnaby identify wrongdoing that may not be uncovered in the absence of a safe, secure and confidential means for disclosing wrongdoing.

This policy will be made available to officers and employees of the Group via email. The policy is also made available to any person wishing to use it by publication on the Company's website at www.carnabyresources.com.au. The Company may exclude information from the version of the policy published on the Company's website that would not be useful or relevant to external Disclosers or that would not be suitable for external publication.

2. Corporations Act Protections

In addition to any protections under this policy, an 'eligible whistleblower' reporting certain information about a member of the Group may have additional protections under Part 9.4AAA of the Corporations Act 2001 (Cth) (**Corporations Act**).

If eligible, these protections include:

- a) confidentiality of identity;
- b) civil, criminal and administrative liability protection;
- c) prevention of enforcement of contractual or other remedy or exercise of contractual or other right against the 'eligible whistleblower';
- d) prohibition of actual or threatened detriment; and
- e) compensation and other remedies may be available for any loss, damage or injury to an 'eligible whistleblower' as a result of detrimental conduct.

(together **Corporations Act Protections**).

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Pursuant to the Corporations Act, detriment includes (without limitation) any of the following:

- a) dismissal of an employee;
- b) injury of an employee in his or her employment;
- c) alteration of an employee's position or duties to his or her disadvantage;
- d) discrimination between an employee and other employees of the same employer;
- e) harassment or intimidation of a person;
- f) harm or injury to a person, including psychological harm;
- g) damage to a person's property;
- h) damage to a person's reputation;
- i) damage to a person's business or financial position; and
- j) any other damage to a person.

(together **Detrimental Conduct**)

3. An 'eligible whistleblower' under the Corporations Act

Pursuant to the Corporations Act, an 'eligible whistleblower' is an individual, relative, dependent or spouse of an individual who is, or has been, any of the following:

- a) an officer;
- b) an employee;
- c) an associate;
- d) a supplier or employee of a supplier of goods or services; or
- e) an individual prescribed by the regulations.

4. Qualifying under the Corporations Act Protections

An 'eligible whistleblower' qualifies for protection under the Corporations Act if they have:

- a) made a disclosure of information relating to a 'disclosable matter' (refer Part 6 of this policy) directly to ASIC, APRA (or other prescribed body), or an 'eligible recipient' (refer Part 8 of this policy);
- b) made a disclosure to a legal practitioner for the purposes of obtaining legal advice or representation about the operation of the whistleblower provisions of the Corporations Act; or
- c) made an 'emergency disclosure' or 'public interest disclosure' (refer Part 9 of this policy).

5. Who this policy applies to

The Group's Whistleblower Policy applies to all disclosers who are considered 'eligible whistleblowers' under the Corporations Act (**Disclosers**). Refer Part 3 of this policy for information regarding 'eligible whistleblowers'.

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6. 'Disclosable matters' under the Corporations Act

Pursuant to the Corporations Act, reporting of a 'disclosable matter' qualifies for the Corporations Act Protections. A 'disclosable matter' is information in which an 'eligible whistleblower' has reasonable grounds¹ to suspect that the information:

- a) concerns misconduct², or an improper state of affairs or circumstances in relation to the company or any of its related bodies corporate;
- b) indicates that the company, a related body corporate or any of their officers or employees have engaged in conduct that constitutes an offence against, or a contravention of, a provision of any of the following:
 - (i) the Corporations Act;
 - (ii) the ASIC Act;
 - (iii) the Banking Act 1959;
 - (iv) the Financial Sector (Collection of Data) Act 2001;
 - (v) the Insurance Act 1973;
 - (vi) the Life Insurance Act 1995;
 - (vii) the National Consumer Credit Protection Act 2009;
 - (viii) the Superannuation Industry (Supervision) Act 1993;
 - (ix) an instrument made under an Act referred to above; or
- c) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- d) represents a danger to the public or the financial system; or
- e) is prescribed by the Corporation Regulations.

(together **Disclosable Matters**)

Disclosures that are not in relation to Disclosable Matters do not qualify for the Corporations Act Protections but may be protected under other legislation.

7. What this policy applies to

This policy is applicable to Disclosable Matters. Disclosable Matters in relation to the Group may include:

- a) illegal conduct such as theft, illicit drug use or dealings, violence or threatened violence and criminal damage of property;
- b) fraud, money laundering or misappropriation of funds;
- c) offering or accepting a bribe;
- d) breach of, or non-compliance with law or regulation;
- e) engaging in Detrimental Conduct as defined in this policy;
- f) conduct that, while not a contravention of a particular law, may still indicate misconduct or an improper state of affairs; and
- g) conduct that indicates a significant risk to public safety or the stability of, or confidence in, the financial system.

¹ 'Reasonable grounds to suspect' is based on the objective reasonableness of the Discloser's suspicion. In practice, a mere allegation with no supporting information is not likely to be considered as having reasonable grounds to suspect.

² 'Misconduct' is defined in Section 9 of the Corporations Act as fraud, negligence, default, breach of trust and duty.

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Given the nature of the Group's operations, the Company draws the attention of potential Disclosers to consideration of Disclosable Matters which specifically relate to the environment, work place safety, insider trading of the Company's shares, the falsification of exploration results and / or other information disclosed to the ASX.

Information regarding the interaction of this policy, the Corporations Act Protections and personal work-related grievances can be found at Schedule 1.

8. Reporting of Disclosable Matters

To be eligible for the Corporations Act Protections, an 'eligible whistleblower' must report the Disclosable Matter directly to any of the following:

- a) the Australian Securities and Investments Commission (ASIC);
- b) the Australian Prudential Regulation Authority (APRA);
- c) other prescribed Commonwealth authority;
- d) an 'eligible recipient';
 - (i) officer³ or senior manager⁴ of the Company or a subsidiary;
 - (ii) a person authorised by the Company to receive disclosures that may qualify for protection under Part 9.4AAA of the Corporations Act;
 - (iii) the Company's auditor (internal or external and includes any member of the audit team);(together **Eligible Recipients**)
- e) legal practitioners for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act are protected (even in the event the legal practitioner concludes that a disclosure does not relate to a Disclosable Matter);
- f) journalists, but only in the circumstances described in Part 9 of this policy; and
- g) members of Commonwealth, State or Territory parliaments, but only in the circumstances described in Part 9 of this policy.

9. Public interest and emergency disclosures

A Discloser may disclose Disclosable Matters to a journalist or parliamentarian and qualify for Corporations Act Protections where the disclosure is a 'public interest disclosure' or an 'emergency disclosure' under the Corporations Act.

A 'public interest disclosure' is the disclosure of information to a journalist or a parliamentarian, where:

- a) at least 90 days have passed since the Discloser made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the Discloser does not have reasonable grounds to believe that action is being, or has been taken, in relation to their disclosure;
- c) the Discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest; and
- d) before making the public interest disclosure, the Discloser has given written notice to the body to which the previous disclosure was made that:

³ An 'officer' includes any director or company secretary of the Group

⁴ A 'senior manager' is a person who makes or participates in decisions that affect the whole or a substantial part of the business of the Group or has the capacity to significantly affect the Group's financial standings.

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- (i) includes sufficient information to identify the previous disclosure; and
- (ii) states that the Discloser intends to make a public interest disclosure.

An 'emergency disclosure' is the disclosure of information to a journalist or parliamentarian, where:

- a) the Discloser has previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c) before making the emergency disclosure, the Discloser has given written notice to the body to which the previous disclosure was made that:
 - (i) includes sufficient information to identify the previous disclosure; and
 - (ii) states that the Discloser intends to make an emergency disclosure; and
- d) the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.

Discloser's must understand the criteria for making a public interest or emergency disclosure. The Group strongly recommends a Discloser contact an independent legal adviser prior to making a public interest or emergency disclosure.

10. How to make a disclosure

Where a Discloser is concerned about potential Disclosable Matters, they may report the matter (make a **Disclosure**) to the Group's Disclosable Matter Reporting Officers (**DMR Officer**). The Group's current DMR Officers and contact details are as set out in Schedule 2.

If a Discloser is not comfortable making a Disclosure to a DMR Officer, or should the DMR Officer or other DMR Officer's be unavailable (and the matter is urgent), they are encouraged to make the Disclosure to a member of the Board of Directors of the Company (**Board**). If a Disclosure is made to a Board member, that individual will act as a DMR Officer for the purposes of this policy. Details regarding the Company's Board are available on the Company's website www.carnabyresources.com.au.

A Disclosure can be made using any method of communication available to a Discloser and the DMR Officer, including via telephone, email or face to face meeting. Disclosures can be made outside of ordinary business hours.

Should a Discloser not wish to make a Disclosure to a DMR Officer, they are encouraged to consider making a Disclosure to the Company's auditors or ASIC. Contact details regarding the Company's auditors are disclosed in the Company's most recent Annual Report, which is available on the Company's website www.carnabyresources.com.au. Information regarding reporting Disclosable Matters to ASIC can be found at the following link: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/>

11. Anonymous Disclosures

Disclosures can be made anonymously and still receive the Corporations Act Protections. Furthermore, a Discloser may choose to remain anonymous over the course of the investigation and following the finalisation of the investigation.

In the event of an anonymous Disclosure, Disclosers are encouraged to maintain two-way contact. Maintaining two-way contact may assist in improving the effectiveness of the investigation.

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A Discloser can help protect their anonymity by considering the use of:

- a) an anonymous telephone;
- b) an anonymised email address; and
- c) a pseudonym.

Should a Disclosure be received from an email address, telephone call or letter from which a person's identity cannot be established, and the person does not identify themselves, the Disclosure will be treated as an anonymous Disclosure.

12. Confidentiality

Under the Corporations Act Protections (with limited exceptions) it is illegal for the identity of the Discloser, or information that is likely to lead to the identification of the Discloser, to be disclosed.

However, the identity of a Discloser may be disclosed:

- a) to ASIC, APRA, or a member of the Australian Federal Police;
- b) to a legal practitioner (for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Corporations Act);
- c) to a person or body prescribed by the Corporations Regulations; or
- d) with the consent of the Discloser.

A person can disclose the information contained in a disclosure of Disclosable Matters without the Discloser's consent if:

- a) the information does not include the Discloser's identity;
- b) the Company has taken all reasonable steps to reduce the risk that the Discloser will be identified from the information; and
- c) it is reasonably necessary for investigating the issues raised in the disclosure.

ASIC, APRA or the Australian Federal Police can disclose the identity of the Discloser, or information that is likely to lead to the identification of the Discloser, to a Commonwealth, state or territory authority to help the authority in the performance of its functions or duties.

A Discloser can lodge a complaint with the Company about a breach of confidentiality to the DMR Officer. They may also lodge a complaint with a regulator, such as ASIC or APRA, for investigation.

13. Measures to protect confidentiality

To ensure compliance with the confidentiality requirements of the Corporations Act Protections, the following measures are in place for protecting the confidentiality of Disclosers, which the DMR Officer is responsible for communicating a Discloser:

- a) all paper and electronic documents and other materials relating to Disclosures are stored securely;
- b) all personal information or reference to the Discloser witnessing an event will be redacted;
- c) the Discloser will be referred to in a gender-neutral context;
- d) where possible, the Discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them;

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- e) access to any information relating to a Disclosure is limited to those directly involved in managing and investigating the Disclosure;
- f) only a restricted number of people who are directly involved in handling and investigating a Disclosure are made aware of a Discloser's identity or information that is likely to lead to the identification of the Discloser (subject to the Discloser's consent); and
- g) communications and documents relating to the investigation of a Disclosure are not sent to an email address or to a printer that can be accessed by other staff.

The DMR Officer or any other person who is involved in handling and investigating a Disclosure is responsible for keeping the identity of the Discloser and the Disclosure confidential. An unauthorised disclosure of a Discloser's identity may be a criminal offence.

Despite the Company's measures and best efforts, a Discloser's identity may be deduced by others. This may be the case where:

- a) the Discloser has mentioned to others they are considering making a Disclosure;
- b) there are only a small number of people with access to the relevant information related to the Disclosure; and
- c) the Disclosure relates to a matter previously informed to the Discloser by another person.

14. Detrimental Conduct

Under the Corporations Act Protections, Detrimental Conduct toward a Discloser (or any other person) is prohibited if:

- a) the person believes or suspects that the Discloser (or any other person) made, may have made, proposes to make or could make a disclosure that qualifies for protection; and
- b) the belief or suspicion is the reason, or part of the reason, for the conduct.

Additionally, a person cannot make a threat of Detrimental Conduct to a Discloser (or any other person) in relation to a Disclosable Matter. A threat may be express or implied, or conditional or unconditional. A Discloser (or any other person) does not have to actually fear that the threat will be carried out.

Potential Disclosers should be aware that:

- a) administrative actions that are reasonable to protect a Discloser from Detrimental Conduct will not be considered Detrimental Conduct. For example, moving a Discloser who has made a Disclosure regarding their immediate work area to another area as a protection from Detrimental Conduct; and
- b) protection from Detrimental Conduct does not prevent the Company from managing a Discloser's unsatisfactory performance. For example where a Discloser's has failed to observe or follow the Company's Corporate Governance Policies and Procedures and is disciplined as a result.

Should the Company need to engage in actions such as those listed at a) or b) above, the Company will ensure that a Discloser understands the reason for the Company's actions prior to undertaking the action and its relevance or otherwise to any Disclosure.

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15. Measures to protect against Detrimental Conduct

The following measures will be considered (as necessary) to protect Disclosers from Detrimental Conduct:

- a) conducting of a risk assessment to determine the likelihood of a Discloser (or any other person) being subjected to Detrimental Conduct as soon as possible after receiving a disclosure;
- b) provision or recommendation of counselling, legal and / or other support services;
- c) development of strategies to help a Discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the Disclosure or its investigation; and
- d) allowing the Discloser to perform their duties from another location, reassign the Discloser to another role at the same level, make other modifications to the Discloser's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the Disclosable Matter.

To assist in assessing and controlling the risk of Detrimental Conduct, the Company has established a Disclosure Risk Assessment and Control Procedure, which can be found at Schedule 3.

Responsibilities of the DMR Officer or any other person who is involved in handling and investigating a Disclosure are as follows:

- a) maintain the confidentiality of a disclosure;
- b) address the risks of isolation or harassment;
- c) manage conflicts; and
- d) ensure fairness when managing the performance of, or taking other management action relating to, a Discloser; and
- e) having complaints about Detrimental Conduct investigated as a separate matter by a person who is not involved in dealing with the Disclosure with the investigation findings provided to the Board.

Where an allegation of Detrimental Conduct has been made, the Company will investigate and address the detrimental conduct by taking disciplinary action and / or:

- a) allow the Discloser to take extended leave;
- b) where possible, develop an alternative career development plan for the Discloser, including new training and career opportunities;
- c) consider an offer of compensation or other remedies.

A Discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered Detrimental Conduct.

16. Compensation and other remedies

A Discloser can seek compensation and other remedies through the courts if:

- a) they suffer loss, damage or injury because of a Disclosure; and
- b) the Company failed to take reasonable precautions and exercise due diligence to prevent a person from causing the Detrimental Conduct.

The Company encourages Disclosers to seek independent legal advice regarding the compensation and other remedies should they experience Detrimental Conduct.

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17. Civil, criminal and administrative liability protection

A Discloser is protected from any of the following in relation to their Disclosure:

- a) civil liability (e.g. any legal action against the Discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- b) criminal liability (e.g. attempted prosecution of the Discloser for unlawfully releasing information, or other use of the Disclosure against the Discloser in a prosecution (other than for making a false disclosure)); and
- c) administrative liability (e.g. disciplinary action for making the Disclosure).

However, the above protections do not grant immunity for any misconduct a Discloser has engaged in that is revealed in their Disclosure.

18. False reporting

A Discloser must have objectively reasonable grounds for suspecting Disclosable Matters. Individuals who deliberately submit false reports will not be able to access the whistleblower protections under the Corporations Act and may result in the Group taking further legal and / or disciplinary proceedings against the individual.

While the Company does not wish to discourage potential Disclosers from making a 'genuine' Disclosure, making allegations that prove to be unsubstantiated and made maliciously or known to be false is strongly discouraged.

19. Preliminary assessment of Disclosures

Should a Discloser make a Disclosure to a DMR Officer, the DMR Officer will confirm the receipt of the Disclosure within five (5) business days, providing the Discloser is contactable.

A DMR Officer will consider location and timing when receiving a Disclosure in light of protecting the Discloser's comfort and confidentiality.

Upon receiving the Disclosure, the DMR Officer will perform a preliminary assessment (**Preliminary Assessment**) of the Disclosure to determine whether:

- a) it qualifies for the Corporations Act Protections; and
- b) a formal, in-depth investigation is required (**Investigation**).

When performing the Preliminary Assessment, the DMR Officer will:

- a) focus on the substance, rather than the motive of the disclosure;
- b) not assume that disclosures about conduct or behaviour that appear to have had a personal impact on a Discloser are somehow less serious as the Discloser's experience may indicate a larger or systemic issue. For example, bullying or harassment experienced by the Discloser may be representative of a more general culture of bullying or harassment or may indicate an environment where other misconduct is occurring.

In circumstances where it may be unclear whether a Disclosure qualifies for the Corporations Act Protections, the DMR Officer should treat the Discloser as though they were protected as a whistleblower under the Corporations Act (or other legislation).

The Preliminary Assessment must be completed within five (5) business days. Upon completing the Preliminary Assessment, the Discloser (if contactable) will be notified of the outcome, should the DMR Officer deem this appropriate.

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20. Investigation of Disclosures

Following the Preliminary Assessment, should an Investigation be required, the DMR Officer will need to determine:

- a) the nature and scope of the Investigation;
- b) the person(s) within and/or outside the Company that should lead the Investigation;
- c) whether additional internal or external investigators are required;
- d) the nature of any technical, financial or legal advice that may be required to support the Investigation; and
- e) the timeframe for the Investigation.

The objective of an Investigation is to determine whether there is enough evidence to substantiate or refute the matters reported. The DMR Officer who receives the Disclosure is responsible for conducting the Preliminary Assessment, Investigation (if applicable) and resolving all reported complaints and allegations concerning the Disclosure.

The DMR Officer has direct access to the Board to request access to independent advisers, investigators and other external or internal resources as reasonably required in order to conduct the Investigation.

The DMR Officer must ensure that all Investigations follow best practice and be conducted in accordance with this policy. Accordingly, Investigations must be thorough, objective, fair and independent and preserve confidentiality. Disclosers must be protected from Detriment in accordance with this policy.

To ensure fairness and independence, Investigations must be independent of the Discloser, individuals who are the subject of the Disclosure and the department involved⁵.

Investigations will ensure fair treatment of all mentioned in the Disclosure or to whom such Disclosures relate. This includes without limitation affording such person(s) due process and a right to be heard on the matter during the conduct of the Investigation and before making any adverse finding against them.

There are limitations to the Company's Investigation process. It may not be possible to undertake an Investigation if the DMR Officer is unable to contact the Discloser and insufficient information has been provided in the Disclosure to allow an Investigation to be conducted.

21. Investigation documentation, reporting and communication

The method for documenting and reporting to various parties under this policy will depend on the nature of the Disclosure. As a general rule, the Company anticipates written records and reports to be kept.

Upon the commencement of an Investigation, and with consideration to the confidentiality requirements of this policy, the Board is notified;

- a) that a Disclosure has been made;
- b) the nature of the Disclosure;
- c) that an Investigation has commenced;
- d) of the background of the Discloser (i.e. supplier, employee, contractor, currently or formerly engaged, etc.);
- e) of the expected timeframe to complete the Investigation; and

⁵ Should the DMR Officer be implicated in the Disclosure, otherwise not be independent or has a conflict of interest, the DMR Officer must excuse themselves from the process and refer the matter to another DMR Officer who is independent of the matter. If no DMR Officers are considered independent, the DMR Officer must inform the Board and refer the matter to an independent external investigator.

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- f) of the expected internal and external resources required.

Thereon, the DMR Officer will submit periodic reports to the Board on the following (with consideration of the confidentiality requirements of this policy):

- a) the status of the Investigation;
- b) any actions taken;
- c) the expected timeframe to complete the Investigation; and
- d) the outcome of the Investigation;

The DMR Officer will also provide the Discloser with updates at various stages of the Investigation. The Investigation process, timeframe and regularity of updates may vary depending on the nature of the Disclosure. The Discloser (if contactable) will be informed of:

- a) when the Investigation has begun;
- b) progress updates during the Investigation;
- c) when the Investigation has been finalised; and
- d) the outcome of the Investigation (should the DMR Officer deem this appropriate in light of the circumstances).

An employee who is the subject of a Disclosure will be advised of:

- a) the subject matter of the Disclosure as and when required by principles of natural justice and procedural fairness, and prior to any actions being taken;
- b) the Investigation will be carried out confidentially (when practical and appropriate to do so); and
- c) the outcome of the Investigation, however they will not be provided with a copy of any Investigation report.

The DMR Officer will determine the most appropriate time to inform any individual who is the subject of a Disclosure about the Investigation, provided that they inform the individual before making any adverse finding against them. In some circumstances, informing the individual at an early stage of an investigation may compromise the effectiveness of the investigation and accordingly, the individual will not be informed until a later time.

22. Review of an Investigation outcome

If the Discloser is not satisfied with the outcome of the Investigation, they may refer the matter to the Board for review. The review will be conducted by a director who was not involved in the original Investigation. The findings of the review will be provided to the board and the Discloser.

The Company is not obliged to reopen an investigation and that it can conclude a review if it finds that the investigation was conducted properly, or new information is neither available nor would change the findings of the Investigation.

A Discloser may lodge a complaint with a regulator, such as ASIC, APRA or the ATO, if they are not satisfied with the outcome of the Company's Investigation.

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Schedule 1 – Personal work-related grievances

Disclosures that relate solely to personal work-related grievances, and that do not relate to Detriment or the threat of Detriment to the Discloser, do not qualify for the Corporations Act Protections. These are matters that relate to the Discloser but do not:

- a) have any implications for the Company or its related bodies corporate; or
- b) relate to any conduct or alleged conduct, about a disclosable matter.

These disclosures may be protected under other legislation.

Examples of personal work-related grievances include:

- a) an interpersonal conflict between the Discloser and another employee; and
- b) decisions that do not involve a breach of workplace laws
- c) decisions about the engagement, transfer or promotion of the Discloser;
- d) decisions about the terms and conditions of engagement of the Discloser; or
- e) decisions to suspend or terminate the engagement of the Discloser, or otherwise to discipline the Discloser.

However, personal work-related grievances may include Disclosable Matters, in which case they may be eligible for the Corporations Act Protections. For example, if a personal work-related grievance:

- a) includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance;
- b) the Group has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the Discloser's personal circumstances;
- c) the Discloser suffers from or is threatened with Detriment for making a disclosure; or
- d) the Discloser seeks legal advice or legal representation about the operation Corporations Act Protections.

Employees of the Group can internally raise personal work-related grievances and other types of issues or concerns that are not covered by the policy with the DMR Officer, who can assist with resolving the grievance. Employees are encouraged to seek legal advice about their rights and protections under employment or contract law, and how to resolve their personal work-related grievance.

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Schedule 2 – DMR Officers

DMR Officer	Position	Contact Details
Peter Bowler	Chairman	Please contact Carnaby's head office for Mr Bowler's contact details. Carnaby's head office contact details are as follows; Telephone: +618 9320 2320 Email: admin@carnabyresources.com.au
Rob Watkins	Managing Director	Please contact Carnaby's head office for Mr Watkins' contact details. Carnaby's head office contact details are as follows; Telephone: +618 9320 2320 Email: admin@carnabyresources.com.au

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Schedule 3 – Risk Assessment and Control Procedure

Upon receiving a report from a Discloser, the DMR Officer must conduct a review gathering information from a Discloser regarding (**Risk Identification**):

- a) the risks they foresee regarding their identity becoming known;
- b) who they fear might cause detriment to them;
- c) whether there are any existing conflicts or problems in the work place; and
- d) whether there have already been threats to cause detriment.

Following the Risk Identification, the DMR Officer must analyse and evaluate the likelihood and the severity of the consequences of each risk (**Risk Analysis**).

Following the Risk Analysis, the DMR Officer is responsible for developing and implementing to prevent or contain the risks (**Risk Controls**). Risk Controls will vary depending upon the Disclosure made, however DMR Officers are directed toward Part 15 of this policy which contains measures to protect Disclosers from Detrimental Conduct.

As the risk of detriment may increase or change as an Investigation progresses, and even after an investigation is finalised, the DMR Officer should monitor and reassess the risk of detriment periodically on an on-going basis.

The DMR Officer must keep appropriate records of Risk Identification, Risk Analysis, Risk Controls and monitoring thereof.