

GBL RM03

Reporting Concerns Policy

(Formerly GBL RM03 Whistleblower Policy)

Functional Group: General Counsel
Policy Owner: General Counsel
Policy Approver: General Counsel
Version: 3.0
Last Updated: 6 May 2025

1. Purpose

Palladium values a culture of openness and transparency, and is committed to exercising and ensuring a high standard of conduct and ethical behaviour in all of our activities, and that of our teams. Palladium operates in accordance with a strict Code of Conduct, as well as our Guiding Principles, and seeks to ensure that its people are comfortable raising matters of concern.

This is especially crucial when we work in challenging environments and with vulnerable people. Palladium has zero tolerance for misconduct and abuse, and our people acknowledge our responsibility to report inappropriate behaviour if we witness or otherwise become aware of it.

Palladium requires reporting of suspected illegal, unethical, fraudulent, or undesirable conduct and provides protections and measures to those persons who disclose wrongdoing so they may do so confidentially and without fear of intimidation, disadvantage or reprisal.

This Reporting Concerns Policy sets out Palladium's approach to reporting concerns, and protections for Disclosers of concerns.

2. Scope and Applicability

This Policy is applicable globally to all Palladium Group operations (being Palladium Global Holdings Inc and its subsidiaries or related companies), and applies to all:

- 2.1. directors, officers, employees, former employees, consultants, contractors, or other associates of Palladium;
- 2.2. individual suppliers of Palladium, or employees of a person or entity that supplies goods or services to Palladium; and
- 2.3. a relative or dependent of one of the people referred to above in 2.1 or 2.2 ("**Disclosers**").

As well as Palladium's commitment to encouraging reporting concerns, Palladium also remains committed to ensuring compliance with various legislative provisions (including whistleblowing laws) that protect the disclosure of certain information.

3. Definitions

For detailed definitions and explanations of terms used in this policy, please refer to our comprehensive GBL CG01 GL01 Definitions of Standard Terms Guidelines.

4. Roles and Responsibilities

This Policy is owned by General Counsel, who is responsible for its oversight and administration.

5. Policy Details and Requirements

5.1. Reporting Concerns

- a. Concerns: Palladium encourages Disclosers to report good faith concerns that anyone involved in Palladium’s business in any fashion has engaged in suspected illegal, unethical, fraudulent, or undesirable conduct (including a breach of the Palladium Code of Conduct, Business Partner Code of Conduct, law, policy, abuse, safeguarding violation or any other relevant matter) (“**Conduct**”).
- b. How to report concerns: Disclosers may use any of the following methods that they are most comfortable with:
 - Internal channels: Contact Palladium staff by email, phone or Teams, including:
 - Your manager or supervisor (where applicable)
 - Project, Corporate or Senior Leadership
 - Human Resources representatives
 - If the incident involves safeguarding, the Safeguarding Focal Point
 - Ethics and Risk Management Team at ethics@thepalladiumgroup.com
 - Safety and Security Team
 - Legal, or Contracts and Compliance Teams
 - Third party hotline: Disclosers may alternatively report concerns anonymously through our 24/7 hotline, operated by a third party unaffiliated with Palladium, by phoning (available as a local call in multiple countries) or lodging an online concern. Details are available here:
 - <https://palladium.ethicspoint.com/>
 - <https://thepalladiumgroup.com/integrity-hotline>
- c. Emergencies: Reporting Concerns in this way is not for situations in which you face immediate risk of physical harm or have suffered physical harm, or you believe that any other individual is at immediate risk. In that case:
 - Follow all safety and emergency procedures related to the relevant worksite.
 - Where appropriate and safe to do so, contact local emergency services or appropriate law enforcement immediately and follow directions provided.
 - After which, contact any site security available and/or the Global Safety and Security team.

- d. Anonymity: Where legally permitted, concerns raised under this policy may be made anonymously, however Palladium encourages Disclosers to identify themselves as this will greatly assist the investigation process.

5.2. Investigations of Concerns

- a. All investigations will be conducted in a confidential, thorough, objective, and fair manner, having regard to conflicts of interest, the nature of the Conduct, and other relevant circumstances.
- b. Investigations are overseen by the Office of the General Counsel. The investigation process and timeframe may vary depending on the nature of the Conduct. The Office of the General Counsel may appoint a person or person(s) (internal or external) to assist with the investigation of the disclosure.
- c. To the extent legally, contractually and practically possible, Palladium will keep the identity of Disclosers confidential.
- d. Where appropriate, relevant and possible, Palladium will seek to provide support to impacted parties/persons.
- e. Where allegations are substantiated, Palladium will take appropriate corrective action.
- f. Consistent with legal requirements, and where practical and appropriate, Palladium will provide the Discloser with information regarding the progress of any investigation, as well as notification that the investigation has been completed. Any information provided to the Discloser will be subject to privacy considerations and limitations.

5.3. Non-retaliation and protection against detrimental conduct

- a. Palladium will not tolerate detrimental or retaliatory acts against a Discloser made in connection with any good faith reporting of concerns. “Good faith” means a reasonable basis to believe that the facts or circumstances reported are true. A “good faith” belief does not require absolute proof or that the conduct reported must be substantiated.
- b. Detrimental or retaliatory acts include any actual or threatened unfair or negative treatment of any kind against an individual because that person has raised a good faith concern or participated in a report or investigation. Retaliation is any action, statement, or behavior that is intended to deter or dissuade someone from engaging in a protected activity. Retaliation may include intimidation; discrimination; harassment; coercion; and adverse employment action such as demotion, suspension, failure to hire or promote or consider for hire or promotion, reduction of compensation, exclusion from Company events or meetings where the person would normally be included, defamation of character, adversely impacted work conditions, failure to provide employment benefits, and termination, as well as related threats of

such actions. Appropriate employee management or discipline unrelated to participation in a good-faith report or investigation is not retaliation.

- c. Any attempt to deter a Discloser from disclosing Conduct may be subject to disciplinary action including termination of any contractual relationship with Palladium.
- d. A Discloser that is subjected to detrimental treatment as a result of a disclosure under this Policy should make a further report in accordance with paragraph 4 of this Policy or contact Palladium's General Counsel.

5.4. Disciplinary action distinguished

- a. As indicated above, the right of a Discloser to protection does not include immunity from investigations of personal wrongdoing, disciplinary action for making knowingly false, reckless or bad faith allegations, and legitimate measures taken to address any unrelated performance issues.
- b. Making a disclosure of Conduct will not protect the Discloser from their own involvement in any Conduct.

5.5. Persons subject to a disclosure

Persons who are the subject of a disclosure are entitled to fair treatment. In order to protect these persons, Palladium will ensure that:

- a. disclosures are handled confidentially, to the greatest extent possible, and appropriately depending on the circumstances;
- b. any investigation into the Conduct will be fair, objective, and independent;
- c. the subject of any disclosure will be informed of the investigation (where permitted by law or the facts), and given a reasonable opportunity to respond before any final decision or determination is made; and
- d. the subject may continue to access Palladium's EAP support services throughout the investigation process

5.6. Knowingly false reports

- a. A Discloser who makes a knowingly false, reckless, or malicious allegation of Conduct may be subject to disciplinary action, including termination of any contractual relationship with Palladium.

6. Policy Violations

Violations of this policy may result in disciplinary actions being taken, which may include termination of employment or contract.

7. Version History

Version	Effective Date	Approved By	Summary of Change
1.0	1 October 2015	CEO	NA
1.1	1 November 2017	CEO	Updated to Align with Regional Business Partnerships
1.2	1 August 2020	General Counsel	Update for new legal requirements and new numbers
2.0	6 April 2021	General Counsel	Updated new format policy incorporating latest legal requirements
2.1	8 March 2022	General Counsel	Updated contact numbers
2.2	11 April 2024	General Counsel	Updated methods of disclosure
3.0	6 May 2025	General Counsel	Updated policy format, routes for reporting, terminology