

WHISTLEBLOWER POLICY

1. Purpose

Altech Chemicals Limited ("Altech") 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 strong corporate governance.

Whistleblowers are those who sound the alert on dishonest or unethical conduct, malpractice, bribery or corruption or illegal conduct.

This Altech's Whistleblower Policy (the "Policy") outlines the rights of all employees and stakeholders of Altech to:

- (a) report in good faith any actual or perceived wrong doing, impropriety, dishonest or unethical behaviour, bribery, corruption, legal or regulatory non-compliance or questionable accounting or audit matter; and
- (b) expect and receive protection from any reprisal or detrimental action resulting from such reporting.

This Policy covers the processes for dealing with disclosures made by employees and stakeholders of suspected improper conduct within Altech in a confidential and secure manner and is intended to apply to whistleblowers in all countries in which Altech operates.

This policy is available on the intranet and website of Altech.

2. Policy Application

This Policy applies to:

- (a) all directors and employees of Altech and its subsidiaries (collectively referred to as Altech); and
- (b) employees or principals of organisations which have a commercial relationship with Altech as customers, suppliers, consultants, advisers, agents or otherwise.

3. Disclosable Matters

Altech directors, employees and stakeholders are encouraged make a disclosure or report under this policy if they have reasonable grounds to suspect that a director, officer, employee, contractor, supplier, tenderer or other person who has business dealings with Altech has engaged in conduct which:

- (a) is dishonest, fraudulent or corrupt, including bribery
- (b) is illegal activity (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- (c) is unethical or in breach of Altech policies (such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching Altech Code of Conduct or other policies or procedures);
- (d) is potentially damaging to Altech, an Altech employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of Altech property or resources;
- (e) amounts to an abuse of authority;
- (f) may cause financial loss to Altech or damage its reputation or be otherwise detrimental to Altech interests;

- (g) involves harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the Corporations Act 2001 (Cth) (Corporations Act); or
- (h) involves any other kind of misconduct or an improper state of affairs or circumstances

In making a disclosure under this Policy, employees and stakeholders must act in good faith on a genuine belief that there has been wrongdoing, and not for any malicious purpose. Where it is determined that a disclosure is made by an employee falsely or for a malicious purpose, Altech reserves the right to take disciplinary action against the disclosing employee.

4. Making A Report

A disclosure/report can be made to any of the following Disclosure Officers:

- (a) **Shane Volk**, CFO & Company Secretary at shane@altechchemicals.com
- (b) **Iggy Tan**, Managing Director at iggy@altechchemicals.com

Or, if involving the Managing Director:

- (c) **Luke Atkins**, Chairman at luke@altechchemicals.com

Reports may also be made by post to Altech Chemicals Limited, Suite 8, 295 Rokeby Road, Subiaco, Western Australia 6008, marked to the attention of one of the Disclosure Officers referred to above.

It is important to note that under the Corporations Act, the whistleblower may also raise the matter with an "officer" or "senior manager" of the company. These are defined in the Corporations Act as "a director, or a senior manager in the company who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business of the company, or who has the capacity to affect significantly the company's financial standing."

5. Investigation of Reportable Conduct

Altech will investigate all matters reported under this policy as soon as practicable after the matter has been reported. Subject to consent from the whistleblower, the Disclosure Officers may appoint a person to assist in the investigation of the report. The matter will be treated seriously and with utmost sensitivity. Employees and stakeholders disclosing wrongdoing will be protected and the investigation will be conducted in an objective and fair manner.

As soon as practicable upon receipt of the report, if the report is not anonymous, the Disclosure Officers or investigator will contact the whistleblower to discuss the investigation process including who may be contacted and such other matters as are relevant to the investigation.

Where a report is submitted anonymously, Altech will conduct the investigation and its enquiries based on the information provided to it.

6. Protection of Whistleblowers

Altech is committed to protecting and respecting the rights of persons who make reports under this policy and ensuring anyone who makes a report based on reasonable grounds is treated fairly and does not suffer detriment.

(a) Protection of identity and confidentiality

The identity of whistleblower will be protected and only shared with the consent of the whistleblower, or if the disclosure is required by law.



(b) Protection of files and records

All files and records created pursuant to a whistleblower report or an investigation will be stored and retained securely and confidentially.

(c) Protection against Detrimental Conduct

Altech will also take all reasonable steps to protect the whistleblower from Detrimental Conduct and will take action it considers appropriate where such conduct is identified. Detrimental Conduct means any actual or threatened conduct that could cause a detriment to the whistleblower as a result of the whistleblower making a disclosure, including:

- (i) termination of employment;
- (ii) harassment, bullying or intimidation;
- (iii) personal or financial disadvantage;
- (iv) unlawful discrimination;
- (v) harm or injury, including psychological harm;
- (vi) damage to reputation; or
- (vii) any other conduct that constitutes retaliation.

Altech also strictly prohibits all forms of Detrimental Conduct against people who are involved in an investigation of a disclosure in response to their involvement in that investigation.

The Corporations Act also gives special protection to disclosures about breaches of that Act, as long as certain conditions are met. Refer to **Appendix 1** for further details.

7. Duties of Employees in Relation to Reportable Conduct

Altech employees who become aware of known suspected or potential cases of Reportable Conduct must make a report under this policy or under other applicable policies.

8. Outcome of Investigations

The discloser will always be informed of the outcome at the conclusion of the investigation. Altech will not tolerate any reprisals against employees or stakeholders who have made a disclosure of any matter under this Policy where the discloser has acted in good faith and on a genuine belief or perception of wrongdoing, and on reasonable grounds. Altech will act in the best interests of a discloser to protect them from any victimisation, adverse reaction or intimidation, and commits to ensure confidentiality (to the extent permitted by law) and fairness in all matters raised under this Policy.

Where an investigation identifies a breach of Altech's Code of Conduct or other internal policies or procedures, appropriate disciplinary action may be taken. This may include, but is not limited to, terminating or suspending the employment of the person(s) involved in the Disclosable Matter/Conduct. If the report finds that there has been a suspected or an actual breach of the law, Altech may refer the matter to the relevant legal authority.

Approved by the Board of Directors of Altech Chemicals Limited on 29 November 2019.



Luke Atkins - Chairman



Appendix 1 – Protections provided by the law

The law offers protections for disclosures made outside the Whistleblower Policy (for example, disclosures on potential misconduct made to people other than the Disclosure Officers).

Special protections under Part 9.4AAA of the Corporations Act 2001 (Cth)

The Corporations Act gives special protection to disclosures about any misconduct or improper state of affairs relating to Altech if the following conditions are satisfied:

- (a) the whistleblower is or has been:
 - (i) an officer or employee of an Altech company;
 - (ii) an individual who supplies goods or services to an Altech company or an employee of a person who supplies goods or services to an Altech company;
 - (iii) an individual who is an associate of a Altech; or
 - (iv) a relative, dependent or dependent of the spouse of any individual referred to above;
- (b) the report is made to:
 - (i) a Disclosure Officer;
 - (ii) an officer or senior manager of Altech;
 - (iii) ASIC;
 - (iv) APRA; or
 - (v) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act;
- (c) the whistleblower has reasonable grounds to suspect that the information being disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to Altech. This may include a breach of legislation including the Corporations Act, an offence against the Commonwealth punishable by imprisonment for 12 months or more, or conduct that represents a danger to the public or financial system.

Examples of conduct which may amount to a breach of the Corporations Act include: insider trading, insolvent trading, breach of the continuous disclosure rules, failure to keep accurate financial records, falsification of accounts, failure of a director or other officer to act with the care and diligence that a reasonable person would exercise, or to act in good faith in the best interests of the corporation or failure of a director to give notice of any material personal interest in a matter relating to the affairs of the company.

The protections given by the Corporations Act when these conditions are met are:

- (a) the whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure;
- (b) no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistleblower for making the report;
- (c) in some circumstances, the reported information is not admissible against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty; Such as where the disclosure has been made to ASIC or APRA, or where the disclosure qualifies as a public interest or emergency disclosure
- (d) anyone who causes or threatens to cause detriment to a whistleblower or another person in the belief or suspicion that a report has been made, or may have been made, proposes to or could be made, may be guilty of an offence and may be liable for damages;
- (e) a whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary; and

the person receiving the report commits an offence if they disclose the substance of the report or the whistleblower's identity, without the whistleblower's consent, to anyone except ASIC, APRA, the AFP or a lawyer for the purpose of obtaining legal advice or representation in relation to the report

