

Whistleblowing

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1 Context and purpose

At Valterra Platinum we are committed to conducting our business in a way that is consistent with our values and our Code of Conduct. From time to time, employees and other stakeholders may observe potentially unethical, unlawful, or unsafe conduct and practices which concern them. This policy sets out how employees and other stakeholders can report issues and concerns confidentially or, if preferred, anonymously.

Valterra Platinum does not tolerate any form of retaliation against anyone for raising or helping to address a concern.

This Policy:

- Describes Valterra Platinum's whistleblowing programme, called YourVoice, which incorporates the whistleblowing reporting channel, which can be used to report issues and concerns.
- Sets out what types of concerns that can be reported under this Policy.
- Explains the commitments Valterra Platinum makes to those who report their concerns under the Policy.
- Describes how to use Valterra Platinum's whistleblowing reporting tool, YourVoice.

As a means of reinforcing Valterra Platinum's values, our whistleblowing tool, YourVoice, serves to build employee, customer, supplier, and stakeholder trust through being an important means by which we can identify and address events that are contrary to our values. Through YourVoice, Valterra Platinum aims to comply with applicable whistleblowing laws.

This Policy applies to all directors, employees, contractors, and representatives of entities in which Valterra Platinum has a direct or indirect interest of greater than 50% unless notified to the contrary, and/or unless any aspect of the Policy is not permitted by local law or regulation.

If a person sees an individual or the company act or behave in a way which they think might be unethical, unlawful, or unsafe, or contrary to our Values and Code of Conduct, they have a responsibility to bring this to the attention of Valterra Platinum. It is recognised this can sometimes be difficult to do, but it demonstrates our unwavering commitment to do what is right.

YourVoice is available to all employees (including contractors, volunteers, and trainees), customers, suppliers, other stakeholders of Valterra Platinum, as well as to colleagues, relatives or other third parties connected with or assisting someone who is reporting a concern.

Note the whistleblowing programme, YourVoice, and the terms of this Policy do not form part of and are not incorporated into any contract you may have with your employer.

2 The YourVoice Whistleblowing programme

As noted above, this policy covers the raising of concerns relating to potentially unethical, unlawful, or unsafe conduct and practices and conduct which is contrary to our Values and our Code of Conduct, including:

2.1 Scope of reportable issues

- Actions that may result in danger to the health and/or safety of people or damage to the environment.
- Criminal offences, including fraud, bribery, corruption and money laundering, and any violation of human rights.
- Conflicts of interest.
- Anti-competitive behaviour prohibited by Antitrust laws.
- Failure to comply with any legal or regulatory obligation.
- Theft, misuse, or misappropriation of company assets, including unethical practices in accounting, internal accounting controls, financial reporting, and auditing matters.
- Breaches of Policies and Procedures, including those that underpin the Code of Conduct.
- Miscarriage of justice.
- Concerns regarding bullying, harassment (including sexual harassment), victimization and discrimination as explained in our Code of Conduct, related to whistleblowing.
- Any other legal or ethical concern.
- Concealment of any of the above.
- Retaliation against anyone for speaking up in good faith.

People making a report need to have a reasonable belief that the conduct or practices they are concerned about have been, are being or are likely to be committed, although there is no need to have firm evidence of this to raise a concern.

2.2 Whistleblower protection, confidentiality, and non-retaliation

The protection of whistleblowers is fundamental to the success of the Whistleblowing programme, YourVoice, as well as being a right afforded by law in some cases and jurisdictions where we operate.

2.2.1 Confidentiality

If a person raises a concern under this policy, we will do our best to keep their identity confidential. However, subject to any local law requirements, there may be circumstances where this is not possible.

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In this case, where permitted by local law or regulation, we will discuss the situation with the person who raised the concern.

2.2.2 Anonymity

If a person raises a concern using YourVoice platform and do not disclose their identity, they should be aware that their identity may nevertheless become apparent during the investigation of their concerns. If it does, their identity will be kept confidential as outlined above.

2.2.3 Non-retaliation

Valterra Platinum treats all reports seriously and is committed to treating employees fairly and protecting them against retaliation. Valtterra Platinum will not tolerate any retaliation (including threats and attempts of retaliation) against an individual for raising a concern, making a report, or assisting in an internal or external investigation. No employee who makes a disclosure, reasonably believing it to be true, will as a consequence of making the disclosure be subject to retaliation, which includes being:

- Subjected to any disciplinary action.
- Dismissed, suspended, demoted, harassed, or intimidated.
- Transferred against his or her will. iv. Refused transfer or promotion.
- Subjected to a term or condition of employment or retirement which is altered or kept altered to his or her detriment.
- Refused a reference or provided with an adverse reference. vii. Denied appointment to any employment, profession, or office. viii. Otherwise adversely affected in his or her employment, including employment opportunities and work security.

The equivalent protection, where relevant, is also extended to any external organisation represented by or supporting the whistleblower.

3 When should YourVoice be used?

Concerns can be raised in a variety of ways:

- An employee's line manager should always be available to the employee as a point of contact to hear their concern.
- If an employee feels that they cannot talk to their line manager, then they should try to speak to another line manager.
- If an employee feels that they cannot speak to any line managers, then they can try to speak to someone who works in a relevant supporting function, such as Safety and Sustainability, Legal, Human Resources or the Compliance team.
- If a person cannot, or do not feel comfortable to speak up using any of the above, then they can use the Whistleblowing reporting tools, YourVoice.

Depending on the issue, people can also use the internal grievance procedure to raise personal work-related grievances. YourVoice, can also be used by employees to report personal work-related issues

or concerns if they do not feel comfortable raising this via the established HR grievance handling mechanisms. However, if they raise a concern using the whistleblowing tool on the YourVoice platform and we think the concern falls within the relevant HR policy/procedure, we will also advise the reporter accordingly.

4 How to use Whistleblowing reporting tools?

The Whistleblowing channel, YourVoice, is operated by an independent third-party service provider (the “Service Provider”) and permits concerns to be raised via a helpline or a web platform.

To report a concern, people can use any of the following ways:

- Via the YourVoice web platform available on our website.
- By calling the YourVoice helpline (24 hour service). People can find the local country numbers in the above mentioned on our website and on the Valterra Platinum intranet site.

The service is available in multiple languages. More information about how to use the whistleblowing service is available on our website.

It is helpful if the people raising concerns using the YourVoice reporting tool, provides as much information as possible when an issue is reported, as it helps when assessing the concern raised, determining what further action is appropriate and conducting any subsequent investigation. However, the company does not expect people raising a concern to have all the facts upfront and we encourage everyone to speak up as soon as possible.

5 What happens to my report?

5.1 Step 1:

YourVoice can be used via the options and details listed above to report an issue or concern.

Please Note – YourVoice is not an emergency service. People need to contact their local authorities if they have a life-threatening issue and for Valterra Platinum Health and Safety urgent concerns also use the existing reporting processes.

5.2 Step 2:

When a report is submitted, the person who raised a concern will receive a unique access number and they can create a password, which can be used to:

- receive updates on the progress of the investigation,
- communicate with the investigation team and provide additional information and/or iii. allow the investigators to request further information relating to their report.

5.3 Step 3:

The Service Provider is required to protect the identity of the person reporting the concern, including never revealing the person's identity to Valterra Platinum without that person's consent.

- If a person elects to make a report with full anonymity, then their identity will not be recorded and, as such, will not be available to Valterra Platinum.
- If a person does not elect to make a report with full anonymity, their concern will be raised on a confidential basis. Their identity will be available to the Service Provider and disclosed to the select personnel within Valterra Platinum (as noted below). Their identity will be kept confidential as outlined under point 8.1.2. above.

Whether a reporter decides to report anonymously or not, the report will be treated as confidential and only used for the intended purpose. If a person is comfortable to make their identity known, it will be easier for the investigators to contact the person to discuss or clarify issues to help with the investigation.

5.4 Step 4:

The report is passed on by the Service Provider to the relevant Valterra Platinum team.

5.5 Assessment and action

The relevant Valterra Platinum team provides acknowledgement of receipt to the reporter via the system within three business days of receipt of the report and allocates the report to the appropriate investigation or legal team. The team/s will consider what action is appropriate and action will be taken accordingly. This could include an informal review, an internal investigation, or a referral to another process such as the HR grievance process, where appropriate.

Investigation status updates might be provided to the person raising the concern. We aim to provide updates within three months. We may not be able to provide specific updates where this could affect the rights of other individuals.

Status updates might be accessed by phoning the Service Provider's call centre or logging into the website that was used to create the original report, using the unique access number and password created.

5.6 Personal information

Valterra Platinum is responsible for personal information processed by the YourVoice reporting tool. This includes personal information provided to the Service Provider by a whistleblower.

Personal information is disclosed to the relevant Valterra Platinum team set out above under 'What happens to my report.' Personal information may also be disclosed in accordance with Valterra Platinum's privacy notice and applicable data privacy laws.

For more detailed information on how Valterra Platinum uses and discloses personal information, the protections we apply, the legal bases for our use of personal information, and your data protection rights, please see the privacy notice which is available online.

6 What do I need to do?

It is the responsibility of all employees to be aware of this Policy, and to read, understand and adhere to the Policy and to any updates to the Policy.

6.1 General Communication

YourVoice is actively and regularly promoted in the workplace, including specific focus during new employee induction. Valterra Platinum will communicate the YourVoice Whistleblowing programme to external stakeholders when considered relevant and appropriate and where required by law.

7 Monitoring and reporting

All concerns submitted through the YourVoice reporting tool will be promptly assessed, appropriately addressed, and closed out. Individual feedback will be provided as set out above.

Trend analysis of reports received through the whistleblowing reporting tool and their resolution is conducted on an aggregated, anonymised basis to identify potential recurrent themes or topics of concern. The outputs of this process and general feedback on the programme are reported to the Valterra Platinum Audit, Risk and Compliance Committee on a regular basis.

8 Glossary

Term / Definition	Definition
Antitrust	Antitrust (or competition) laws are a function of economic policy. They exist to promote effective competition between businesses to ensure that consumers benefit from fair prices, choice, and quality. Antitrust laws invariably have the same core prohibitions and typically apply to activities that have adverse effects in the jurisdiction concerned, regardless of where the anti-competitive conduct takes place.
Bribery	Bribery is the act of promising, offering, or giving an advantage to a person or entity, either directly or indirectly, so that the person or entity perform or refrain from performing, an act in breach of their business or public duties. Common examples of bribery include: • cash or other forms of payment to secure a contract or obtain a licence.

Term / Definition	Definition
	- improper donations to political parties or related organisations; and - excessive gifts or entertainment intended to influence the recipient to undertake a particular course of action.
Bribes	Bribes may consist of anything of value, not simply a payment of cash, and may include the provision or receipt of: - lavish or disproportionate gifts and entertainment. - donations with an ulterior motive. - payment of travel expenses or accommodation for a customer or official when there is no underlying business purpose for a trip; or - use of corporate assets for activities which are unrelated to our business or approved charitable purposes.
Company	Valterra Platinum
Conflict of Interest	Conflicts of interest can arise when financial or personal considerations may influence or appear to influence the judgement or actions of our employees in performing their duties or have the potential to do so. Such conflicts can occur when private and company interests are mixed or when business or governmental decisions are based on private interests.
Employee	All employees (including contractors, volunteers, and trainees) of Valterra Platinum and its subsidiaries.
Employee	All employees (including contractors, volunteers, and trainees) of Valterra Platinum and its subsidiaries.
Fraud	A deceptive act to obtain a gain for one party and/or create a loss for another party. - Fraud involves the deliberate misrepresentation or omission of information and/or the abuse of position. Examples include: - Understating climate emissions (misrepresentation) - Not disclosing requested information from a job application to secure employment (omission) - Informing a bidder of prices tendered by competitors (abuse of position) - Fraud may be relevant to one or more of the Business Integrity areas covered in this Policy. Examples include: - A potential counterparty includes a sanctioned entity and misrepresents its corporate structure to secure a supply agreement with Valterra Platinum (sanctions). - A tax adviser working for Valterra Platinum creates complex and illegal company structure to evade tax (anti-tax evasion).

Term / Definition	Definition
	- A supplier gives an Valterra Platinum employee a gift in return for confidential tender information (anti-bribery – gifts, entertainment, and hospitality). - An employee owns a business that supplies services to Valterra Platinum and approves payments for fictitious work performed by that business (anti-bribery - conflict of interest). An Valterra Platinum-appointed director of a joint venture business intentionally discloses confidential information in breach of information sharing protocols (fair competition).
Money Laundering	Money laundering is the process by which criminals attempt to conceal the origin and ownership of the money or assets gained through criminal activity. When successful, money laundering gives criminals a legitimate cover for “proceeds of crime” and allows them to retain control over them. There are various criminal offences relating to money-laundering, including: • being involved in a transaction which you know, or suspect involves money or assets linked to criminal activity. • acquiring, possessing, using, concealing, or transferring proceeds of crime; and • helping someone else acquire or deal with proceeds of crime. Penalties for money-laundering are severe and can include imprisonment for individuals and large fines and reputational damage for Valterra Platinum
People	People include all employees (including contractors, volunteers and trainees), customers, subcontractors, suppliers, other stakeholders of Valterra Platinum, as well as to colleagues, relatives or other third parties connected with or assisting someone who is reporting a concern.
Valterra Platinum, the “Valterra Platinum,” “we”, “us”, and “our”	In this Policy, and any related procedures or standards, references to “Valterra Platinum”, the “Valterra Platinum”, “we”, “us”, and “our” are to refer to either Valterra Platinum and its subsidiaries and/or those who work for them generally, or where it is not necessary to refer to a particular entity, entities or persons. The use of those generic terms is for convenience only and is in no way indicative of how the Valterra Platinum or any entity within it is structured, managed or controlled.