



**SUNDANCE RESOURCES LTD.  
MANAGEMENT SYSTEM**

**Whistleblowing Policy**

**Standard**

SDL is committed to developing a culture consistent with its Values (Achievement, Care and Respect, Safety and Sustainability, Working Together and Integrity), where individuals are encouraged to raise concerns about poor or unacceptable practice and misconduct, in a supportive environment.

The purpose of this Policy is to promote responsible “whistleblowing” about issues where the interests of others, including the public, or of the Company itself, are at risk.

**Expectation**

- Potential issues of integrity could include but not be limited to actual or potential:
  - criminal offence
  - breach of a legal obligation
  - miscarriage of justice
  - financial impropriety
  - danger to the health or safety of any individual
  - damage to the environment
  - deliberate covering up of information regarding issues.
- Issues relating to an individual’s personal position are to be addressed with care and respect, using the grievance procedure
- The Company will not tolerate the harassment or victimisation of individuals who raise genuine issues and will deal with any such occurrences under the disciplinary and/or harassment procedure
- Where an issue is raised in good faith, individuals will not suffer any form of reprisal, whether or not the issue is proved unfounded or real
- Individuals who maliciously raises an issue which they know to be untrue, will be dealt with through the disciplinary procedure
- An individual’s identity will be protected, if desired and possible (this should be highlighted at the earliest convenient moment). If the matter can only be resolved by revealing the whistleblower, the investigator will discuss with them whether and how to proceed. Everything possible will be done to support and protect the individual.
- Anonymous reports will be considered but are more difficult to investigate and resolve, therefore individuals are encouraged to put their name to reports and assist the investigating officer as much as they can
- Individuals reporting an issue are to speak or write to their immediate Manager. If this is not appropriate - for any reason - individuals may speak directly to a designated senior manager.

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					Page 1 of 1