



RBM MINERAL RESOURCES CC

A MEMBER OF THE RBM GROUP · SOUTH AFRICA | UAE

SPEAKING UP

Whistleblower Policy

Reporting wrongdoing, and the protection available to those who report it

Issued having regard to the *Protected Disclosures Act 26 of 2000*.

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1. Purpose

This Policy encourages anyone who has a reasonable belief that wrongdoing has occurred, is occurring or is likely to occur within RBM Mineral Resources CC, a member of the RBM Group (the "**Company**"), to report it, and sets out how the Company protects those who do. It is issued having regard to the Protected Disclosures Act 26 of 2000.

It applies to employees, former employees, members, contractors, consultants, agents, suppliers, clients, community members and any other person with information about the Company's conduct.

2. What should be reported

- a criminal offence, including bribery, corruption, fraud, theft or money laundering;
- a failure to comply with a legal obligation, including licence, export, environmental, tax or labour obligations;
- a miscarriage of justice;
- conduct endangering the health or safety of any person;
- damage to the environment;
- unfair discrimination, harassment or victimisation;
- the deliberate concealment of any of the above; or
- a breach of the Company's Code of Ethics and Business Conduct or any of its policies.

A report should be made where the person has a reasonable belief that the information is substantially true. It is not necessary to have proof, and a person will not be penalised for an honest report that turns out to be mistaken. Reports known to be false, or made maliciously, are a disciplinary offence.

3. How to report

Route	Detail
Line manager	Appropriate for most operational concerns.
Compliance Officer	Where the concern involves compliance, finance, the line manager, or where the reporter prefers.
Confidential email	compliance@rbmgroup.co.za – monitored by the Compliance Officer. Reports may be made anonymously.
Managing Member	Where the concern involves the Compliance Officer or senior management.
External	Nothing in this Policy limits the right to report to a regulator, a legal adviser, or the South African Police Service.

A report is more easily investigated if it states what happened, who was involved, when and where, and what evidence exists. An anonymous reporter is encouraged to provide a means of anonymous contact, since the Company may be unable to investigate a report it cannot clarify.

4. Confidentiality and anonymity

The Company treats the identity of a reporter as confidential and discloses it only where the reporter consents, or where the Company is compelled by law, or where disclosure is unavoidable in order to investigate – in which case the reporter is told in advance wherever possible. Investigation files are kept separately with restricted access.

5. Protection from retaliation

No person who makes a report in good faith will be dismissed, disciplined, demoted, transferred, refused promotion, harassed, excluded, or subjected to any other detriment because of that report. This protection extends to any person who assists an investigation.

Retaliation is a serious disciplinary offence which may result in dismissal, and may also give rise to a claim by the affected person. Any person who believes they have suffered retaliation should report it immediately using the routes in Section 3.

6. How reports are handled

Stage	Timing	What happens
Acknowledgement	Within 5 working days	The reporter is acknowledged, where contactable, and told who is handling the matter.
Assessment	Within 10 working days	The Compliance Officer assesses seriousness, credibility and whether an external report is required.
Investigation	Proportionate to the matter	Conducted by a person independent of the conduct reported, with external assistance where needed. Findings are documented.
Outcome	On completion	The reporter is told, so far as confidentiality and the law permit, that the matter is concluded and in general terms what was done.
Reporting	At least annually	The Compliance Officer reports the number, nature and outcome of reports to the Managing Member, without identifying reporters.

7. Records

Reports, investigation records and outcomes are retained for at least five years, with access restricted to the Compliance Officer, the Managing Member and the Company's legal advisers.

8. Review

This Policy is reviewed at least annually by the Compliance Officer. Material amendments require the approval of the Managing Member.

Approval

Approved by the Managing Member of RBM Mineral Resources CC on 19 August 2026, with effect from that date.

Signature  R H Rayman — Managing Member for and on behalf of RBM Mineral Resources CC	Date 19 August 2026 Effective from
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