



TRINITY
METALS

GROUP POLICY

WHISTLEBLOWING

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INTRODUCTION

1. Purpose

In line with the requirements set out in Rwanda Law 44Bis/2017 relating to the protection of whistleblowers, Trinity Metals is committed to developing a culture in which all employees can raise concerns about poor or unacceptable behaviours, and they can do so safely without fear of any negative consequences.

This policy aims to promote responsible whistleblowing about issues that put the interests of others, including the public or the Company itself, at risk. Such issues might include the following:

- a criminal offence
- the breach of a legal obligation
- a miscarriage of justice
- financial impropriety
- a danger to the health or safety of any individual
- damage to the environment
- deliberate covering up of information tending to show circumstances of this kind.

Exceptions apply where the issue relates to an employee's personal position. In this case, it may be more appropriate to use an employee grievance or other relevant complaint processes.

An employee who raises a concern will not be expected to produce unquestionable evidence to support the case. The employee must have a genuine concern raised in good faith. It is in the Company's best interest to receive and acknowledge concerns at the earliest possible opportunity. Once a potential problem has been flagged, the Company must investigate the matter further.

2. Application

This policy applies to Trinity Metals and all affiliated companies (Trinity Metals Group). It applies to all personnel of the Trinity Metals Group, whether Directors, Employees, Consultants or Contractors, and whether working part-time or full-time on Trinity Metals business ("Trinity Metals personnel").

3. Commencement

This policy applies from September 2022.

4. Authority and Management

The Board of Directors approved this policy and will review it periodically, not less than every two years or any other time deemed necessary.

POLICY

1. Safety and Confidentiality

No whistle-blower will be regarded in a negative light. The Company recognises that a whistleblower only decides to express concern after much thought. Provided the concern is raised in good faith, the Employee will not risk losing their job or suffering reprisal for coming forward. It does not matter whether the suspicion proves to be unfounded or real. The Company will not tolerate the harassment or victimisation of anyone who raises a genuine concern and will deal with such occurrences under the Disciplinary and/or Harassment procedure.

If an employee maliciously raises a matter they know to be untrue, this will be regarded as misconduct and dealt with through the disciplinary procedure.

The Company recognises that the whistle-blower may not wish to be identified during an investigation. To this end, and per the provisions of Rwanda law 44bis/2017, the Company will assign a code number to all whistleblowers. This code number will be used for all reporting purposes, and only designated managers will have access to the names and details of the relevant employees. If it is impossible to resolve the matter without revealing the whistleblower's identity, the Designated Manager/ officer will discuss whether and how to proceed with the whistleblower. Meanwhile, the Company will do everything possible to support and protect the employee.

A whistle-blower should raise whistleblowing concerns openly under this policy. If an employee wants to give a report or raise their concern confidentially, management will make every effort to keep their identity confidential. However, completely anonymous disclosures are challenging to investigate and resolve. Employees are therefore encouraged to include their names on reports and assist the investigating officer as much as possible.

2. Procedure for Reporting Concerns

- a. Any employee who wishes to raise concerns under this policy should speak directly to the Manager of their Department. If they feel the Manager of the

Department may be compromised or biased in any way, they should report the matter directly to their General Manager. If the Employee does not wish to be identified, they should say this at the first possible opportunity so that appropriate arrangements can be made.

- b. The relevant Manager will note the key points of the concern and check that the employee has read and understood the content of this whistleblowing policy. The Manager will also assure the Employee of confidentiality.
- c. The Manager will then notify the Group Legal Counsel, who will maintain a register of all complaints for reporting purposes and keep them apprised of the matter.
- d. After discussing the matter with the relevant General Manager, the Manager will decide what action to take. This may include initiating an internal investigation or a more formal inquiry to take an appropriate alternative action. The Manager will inform the Employee who raised the concern about the action to be taken. The Employee can request that this is done in writing.
- e. The Manager may ask the Employee how they think the matter might be resolved. If the Employee has any personal interest in the subject, this must be made known to the Manager at the outset. If the Manager thinks the case should be pursued through the grievance procedure instead of through this policy, they will advise the Employee accordingly.
- f. If an investigation is undertaken, the Manager will inform the employee about what is happening as soon as possible. If requested, these reports will be made in writing. In some cases, it may not be possible to report to the Employee the precise action taken as doing so might, for example, infringe on someone else's confidentiality.
- g. After the matter, the Manager will provide a summary report to the General Manager and the Group Legal Counsel.
- h. If the whistleblowing is about the General Manager or a member of the Company Leadership Team, the matter should be reported to the Chief Executive Officer and Group Legal Counsel.

- i. If the whistleblowing is about the CEO, the matter should be reported to the Chairperson of the Board.

This policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. Employees are therefore encouraged not to disclose cases to anyone externally.

The law recognises that in some circumstances, it may be appropriate for a Whistleblower to report the concerns to an external body such as a Regulator. In such instances, Management strongly encourages Employees to seek appropriate advice before reporting a concern externally.

Any Public Concerns/whistleblowing about the Company will be operated through a confidential helpline displayed on the Company Premises.