



Whistleblowing Policy

1. POLICY STATEMENT

Greatland is committed to conducting business with honesty and integrity. To achieve this commitment, Greatland seeks to establish a culture of openness and accountability whereby employees are confident that genuine issues may be raised in good faith without the fear of reprisal.

This Policy assists employees understand how they can raise concerns and report suspected wrongdoing, in the knowledge that such concerns will be taken seriously and investigated appropriately with confidentiality respected.

2. THE SCOPE OF THIS POLICY

This Policy covers all employees, directors and contractors of Greatland Gold plc and its controlled subsidiaries (Greatland).

3. WHAT IS WHISTLEBLOWING

Whistleblowing is the disclosure of information or raising a genuine concern in good faith which relates to suspected wrongdoing or dangers relating to Greatland.

This may include:


- Criminal activity
- Danger to health and safety
- Damage to the environment
- Failure to comply with any legal or professional obligation or regulatory requirements
- Bribery
- Financial fraud or mismanagement
- Negligence
- Breach of internal policies and procedures
- Conduct likely to damage Greatland's reputation
- Unauthorised disclosure of confidential information
- The deliberate concealment of any of the above matters

Reportable conduct does not include personal work-related grievances.

Often an issue or concern may be raised with your colleague or manager, either in person or in writing. This is likely to be the most efficient and effective way of resolving a matter.

Where you are uncomfortable to raise a matter with your colleagues or manager or feel having raised the issue the concern was not addressed; you have the option to raise the matter in accordance with this Policy.

If you are uncertain whether something is within the scope of this Policy, you should seek advice from the one of the Contacts provided within this Policy.

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4.0	November 2022	 Shaun Day, Managing Director

4. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

All staff are responsible for their own compliance and should ensure that they take the time to read and understand this Policy. Any breach of this Policy should be reported to the Contacts provided as part of this Policy.

5. CONFIDENTIALITY

Issues raised under the Whistleblowing Policy would ideally be discussed openly and transparently. Should a whistle-blower prefer to raise an issue and maintain confidentiality every effort will be made to maintain confidentiality of the whistle-blower's identity.

Greatland does not encourage issues to be raised anonymously. Engagement with the whistle-blower is typically required to establish whether an allegation is credible and raised in good faith.

6. EXTERNAL DISCLOSURES

The aim of this Policy is to provide an internal mechanism for reporting of an issue. The Contacts established in respect of this Policy also includes an independent whistleblowing organisation.

The law recognises that in some rare circumstances it may be appropriate for you to report your concerns to an external regulator. The independent whistleblowing organisation operates a confidential helpline.

On occasions, a whistleblowing concern may relate to the actions of a third party, such as supplier, service provider, business partners, etc. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility.

7. INVESTIGATION AND OUTCOME


Once you have raised a concern, Greatland will conduct an initial assessment to determine the scope of any investigation. You will be informed of the outcome. You may be required to attend additional meetings to provide further information.

In some cases, Greatland may appoint an investigator with relevant experience or specialist knowledge.

Greatland will seek to keep a whistle-blower informed of the progress of an investigation and its likely timeframe, however, the need for confidentiality may prevent the sharing of specific details or outcome of an investigation. You should treat any information about the investigation as confidential.

8. IF YOUR ARE NOT SATISFIED

If you are not satisfied with the way in which your concern has been handled, you can raise any concerns with the Contacts provided as part of this Policy.

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9. PROTECTION AND SUPPORT FOR WHISTLE-BLOWERS

Greatland seeks to establish a culture of openness and accountability whereby employees are confident that genuine issues may be raised in good faith without the fear of reprisal.

If concluded that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

10. CONTACTS

Company Secretary	Stephen Ronaldson Telephone: +44 (0)20 7216 5585 E-mail: S.Ronaldson@druces.com
Independent Whistleblowing Organisation	Helpline: +44 (0) 20 3117 2520 Email: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk/

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