



Australian Whistleblower Protection Policy

Adopted by the Board on 19 December 2019
(Revised March 2025)

1. Introduction and purpose

Dyno Nobel Limited and its Australian incorporated subsidiaries, and related bodies corporate (**Dyno Nobel**) are committed to a culture of compliance, ethical behaviour and good corporate governance. As part of that commitment, we encourage and empower our staff to speak up and voice concerns.

Our Group Whistleblower Protection Policy encourages employees to report improper, illegal and unethical conduct within the Dyno Nobel group companies.

Due to the specific obligations and protections available under Australian law in relation to whistleblowers, Dyno Nobel Limited has adopted this Australian Whistleblower Protection Policy (**Policy**) as a supplement to the Group Whistleblower Protection Policy.

This Policy aims to:

- encourage the reporting of misconduct or improper business conduct within Dyno Nobel; and
- outline the legal protections available to whistleblowers under Australian law and this Policy.

To the extent of any inconsistency between this Policy and the Group Whistleblower Protection Policy, this Policy will apply.

Nothing in this Policy should be taken as restricting you from reporting any matter under the Group Whistleblower Protection Policy or to your Manager in the ordinary course.

2. Who does this Policy apply to?

This Policy applies to current and former:

- officers and associates of Dyno Nobel Limited and its Australian incorporated subsidiaries (for example, a director or corporate secretary);
- employees of Dyno Nobel Limited and its Australian incorporated subsidiaries;
- suppliers of goods or services (whether paid or unpaid) to Dyno Nobel Limited and its Australian incorporated subsidiaries and their employees; and
- relatives, dependants and spouses of all of the above,

(referred to below as "**you**" or "**whistleblower/s**").

3. What is reportable under this Policy?

If you have concerns about conduct within Dyno Nobel which you have reasonable grounds to suspect is misconduct or concerns an improper state of affairs or circumstances in relation to Dyno Nobel, you may raise those concerns under this Policy (**Eligible Report/s**).

By way of example, the types of misconduct that may be the subject of an Eligible Report include illegal conduct, fraud, negligence, dishonest, unethical or corrupt conduct.

The conduct you report under this Policy does not have to involve the breach of particular law to qualify as an Eligible Report. You can also still qualify for protection if your report turns out to be incorrect.

Only Eligible Reports qualify for protection under Australian law and this Policy. Reports relating to breaches of Dyno Nobel's policies and procedures, which do not rise to the level of misconduct or an improper state of affairs as described above, are not Eligible Reports.

Additionally, reports that relate solely to personal work-related grievances, and that do not relate to a detriment or threat of detriment to you, are not Eligible Reports and therefore do not qualify for protection under this Policy.

Personal work-related grievances are grievances which relate to your current or former employment and have implications for you personally, but do not have any other significant implications for Dyno Nobel.

Examples of personal work-related grievances are:

- an interpersonal conflict between you and another employee;
- a decision relating to your engagement, transfer or promotion;
- a decision relating to the terms and conditions of your engagement; or
- a decision to suspend, terminate or discipline you in line with applicable policies or procedures.

For personal work-related grievances, you are encouraged to contact your direct Manager, Plant Manager or HR contact.

Please note that a decision about, or including, a personal work-related grievance may still qualify for protection if:

- it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (a mixed report);
- Dyno Nobel has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the report relates to information that suggests misconduct beyond your personal circumstances;
- you are suffering from or are being threatened with detriment for making a report (see section 5 "Legal protections" below); or
- you seek legal advice or representation about the operation of the whistleblower protections under the *Corporations Act 2001* (Cth) (**Corporations Act**).

4. How to make an Eligible Report

To qualify for protection under Australian law and this Policy, you must make an Eligible Report to an "Eligible Recipient".

Dyno Nobel's Whistleblower Hotline (**Navex Global**) is its preferred Eligible Recipient. Dyno Nobel encourages whistleblowers to report concerns via the Whistleblower Hotline so that it may action those concerns promptly.

Navex Global is an externally managed, worldwide service that is multi-lingual, confidential and anonymous (if you wish). Navex Global may be contacted at any time and can take reports in English, French, Spanish, Turkish and Bahasa. Navex Global can be contacted in the following ways:

Online: <http://dynonobel.ethicspoint.com>

Phone (Australia): 1800 743 483 or 1800 452 415

You can also report your concerns to a Whistleblower Protection Officer at:

whistleblowerprotection@dynonobel.com

Other Eligible Recipients to whom you can make reports are:

- Dyno Nobel's senior managers (ie, members of the Executive Team reporting directly to the MD & CEO);
- Dyno Nobel's officers (ie, directors and company secretaries);
- Dyno Nobel's internal or external auditors;
- Dyno Nobel's actuaries; and
- if the report relates to Dyno Nobel's tax affairs, an employee or officer who has functions or duties that relate to Dyno Nobel's Australian tax affairs (i.e., the Group Tax Manager), or a registered tax agent or BAS agent of the company.

You may also make a report to Australian Securities & Investments Commission (**ASIC**), Australian Prudential Regulation Authority (**APRA**) or the Commissioner of Taxation, or a legal practitioner if the report is made for the purpose of obtaining legal advice or representation in relation to the Australian whistleblower laws. Please note that Dyno Nobel's in-house and external lawyers act for Dyno Nobel and cannot provide personal legal advice.

In certain circumstances concerning the public interest or emergencies, you may also make a report to a journalist or parliamentarian. Those circumstances are set out in section 1317AAD of the Corporations Act. It is important that you understand the criteria contained in section 1317AAD and seek independent legal advice before making a public interest or emergency disclosure.

Reports that are made to any person other than those listed above will not qualify for protection under Australian law.

Eligible Reports may be made anonymously and still qualify for protection under Australian law and this Policy. You can choose to remain anonymous when making a report, over the course of any investigation, and after the investigation is finalised. However, anonymity may affect the ability of Dyno Nobel to investigate the matter effectively and to communicate with you about outcomes of that investigation.

5. Legal protections

Eligible Reports made to Eligible Recipients qualify for various protections under Australian law and this Policy.

Identity protection (confidentiality)

It is illegal for a person to identify a whistleblower or to reveal information that could lead to a whistleblower's identification in connection with an Eligible Report, except if the person discloses that information:

- to ASIC, APRA, or a member of the Australian Federal Police;
- to a legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower laws; or
- with your consent.

Additionally, if it is reasonably necessary for the purposes of investigating an Eligible Report and where a person has taken reasonable steps to protect a whistleblower's identity, that person may disclose information that could lead to a whistleblower's identification during the course of an investigation.

In practice, Dyno Nobel will protect the confidentiality of a whistleblower's identity in connection with an Eligible Report by:

- training Eligible Recipients on their confidentiality obligations;
- redacting personal or potentially identifying information from written reports;
- storing paper and electronic records securely; and
- restricting access to information to appropriate persons.

Protection from detrimental conduct

Whistleblowers and other people will be protected from detrimental conduct or threats of detrimental conduct in relation to Eligible Reports.

Detrimental conduct includes: dismissal; injury in employment; alteration of position or duties to an employee's disadvantage; discrimination; harassment or intimidation; harm or injury to a person, including psychological harm; damage to a person's property; damage to a person's reputation; damage to a person's business or financial position; and any other damage.

Detrimental conduct does not include:

- administrative action that is reasonable for the purpose of protecting a whistleblower from detriment (e.g., moving a whistleblower who has made a report about their immediate work area to another office);
- managing a whistleblower's unsatisfactory work performance, if the action is in line with Dyno Nobel's performance management framework.

In practice, Dyno Nobel will protect whistleblowers from detriment in relation to an Eligible Report by:

- assessing the risk of detrimental conduct to a whistleblower as soon as possible after receiving an Eligible Report and implementing appropriate strategies to manage that risk;
- training Eligible Recipients on their obligations in relation to detrimental conduct;
- supporting the whistleblower throughout the process in accordance with Dyno Nobel's internal policies and procedures and the law;
- ensuring appropriate grievance mechanisms in relation to reporting detrimental conduct; and
- reminding whistleblowers that they may seek independent legal advice or contact regulatory bodies if they believe they have suffered detriment.

Compensation and remedies

Under Australian law, a whistleblower who makes an Eligible Report (or any other employee or person) can seek compensation and other remedies through the courts if:

- they suffer loss, damage or injury because of an Eligible Report; and
- the relevant Dyno Nobel entity failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Dyno Nobel encourages you to seek independent legal advice in relation to compensation and remedies.

Liability protection

A whistleblower who makes an Eligible Report is protected from the following in relation to the Eligible Report:

- civil liability (eg, legal action against the whistleblower for breach of contract);
- criminal liability (eg, attempted prosecution of the whistleblower for releasing information); and
- administrative liability (eg, disciplinary action for making the Eligible Report).

However, Australian law does not grant immunity for any misconduct a whistleblower has engaged in that is revealed in their Eligible Report. Australian law also does not protect persons who deliberately make false reports.

6. Handling an Eligible Report

Dyno Nobel will treat Eligible Reports seriously and respectfully. If appropriate, they will be investigated promptly and in a fair and objective manner.

Once an Eligible Recipient receives an Eligible Report, the key next steps are:

1. the Eligible Recipient will communicate the Eligible Report to the Australian Whistleblower Protection Officer (preserving confidentiality if the whistleblower has not provided consent for their identity to be revealed);

2. the Australian Whistleblower Protection Officer will review the Eligible Report and determine whether it qualifies for protection under this Policy and whether further investigation is necessary;
3. if so, the Australian Whistleblower Protection Officer (or his or her delegate) will investigate the matters raised in the Eligible Report as appropriate, seeking input from relevant subject matter experts if necessary, to determine whether the whistleblower's concerns are substantiated; and
4. if substantiated, Dyno Nobel will take appropriate remedial action.

If appropriate and practical to do so, the Australian Whistleblower Protection Officer or the Eligible Recipient will provide updates to the whistleblower during the course of the investigation, and will communicate the outcome of their assessment and/or investigation to the whistleblower.

As noted above, unless the whistleblower's consent is obtained, information that could lead to identification of the whistleblower will only be disclosed to the extent reasonably necessary to investigate the matter. The Eligible Recipient and the Australian Whistleblower Protection Officer must also take all reasonable steps to reduce the risk that the whistleblower will be identified as a result of the substance of the report becoming known. However, the Australian Whistleblower Protection Officer may not be able to undertake an effective investigation if a report is made anonymously and the whistleblower has not provided, or is unwilling to provide, a means of contacting them.

Provided that you have reasonable grounds to suspect the matters contained in an Eligible Report, you will not be subject to disciplinary sanctions for making it. However false reporting, under this Policy or otherwise, will be treated as a serious disciplinary matter.

If you are the subject of an Eligible Report, Dyno Nobel will ensure fair treatment by:

- where appropriate, providing you with notice of relevant matters and a chance to respond;
- maintaining, as far as possible, the confidentiality of the subject matter of the Eligible Report within Dyno Nobel; and
- appointing an investigator who is independent of both the whistleblower and any persons referred to in the Eligible Report.

7. Further advice

A copy of the policy is available on Dyno Nobel's intranet and its external website.

If you do not understand this Policy, or if you are uncertain as to whether any aspect of this Policy applies to you, please contact the Legal Team.

8. Amendments

Dyno Nobel reviews its policies from time-to-time to ensure compliance with applicable law and conformity with industry practice. Therefore, this Policy may be amended, modified or waived at the discretion of Dyno Nobel in accordance with application law and regulation.