**WHISTLEBLOWER POLICY**

At SRA we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, members, suppliers, shareholders and other stakeholders. SRA is committed to ensure corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in all our business activities.

**PURPOSE**

SRA encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving SRA’s business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation, intimidation or reprisal.

This policy will be made available on SRA website and in any other ways that will ensure that it is made available to persons to whom this policy applies.

**SCOPE**

This policy applies to any person who is, or has been, any of the following with respect to SRA:

* Employee or officer of SRA;
* Managing Director and CEO;
* Contractor (including sub-contractors and employees of contractors);
* Supplier (including employees of suppliers);
* Auditor;
* Relative, dependant, spouse, or dependant of a spouse of any of the above.

**REPORTABLE CONDUCT**

You may make a report or disclosure under this policy if you have reasonable grounds to believe that a Company Manager, Director, officer, employee, contractor, supplier, consultant or other person who has business dealings with SRA has engaged in conduct (‘Reportable Conduct’) which is:

* Dishonest, fraudulent or corrupt;
* Illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
* Unethical including any breach of SRA’s policies such as the Code of Conduct; Oppressive or grossly negligent;
* Potentially damaging to SRA, its employees or a third party;
* Misconduct or an improper state of affairs;
* A danger, or represents a danger to the public or financial system;
* Harassment, discrimination, victimisation or bullying
* Involves any other kind of misconduct or an improper state of affairs or circumstances.

**MAKING A DISCLOSURE**

SRA relies on its employees maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any Reportable Conduct, it is expected that you will make a disclosure under this policy.

There are several ways in which you may report or disclose any issue or behaviour which you consider to be Reportable Conduct.

Internal Reporting

You may disclose any Reportable Conduct to the Whistleblower Protection Officers listed below:

*● Title: Executive Assistant*

Name: Michelle Straton

Email Address: mstraton@silicaresources.com.au

*● Title: Managing Director*

Name: Robert Tindall

Phone Number: 0457 999 094

Email Address:  rtindall@silicaresources.com.au

The Whistleblower Protection Officer or eligible recipient will safeguard your interests and will ensure the integrity of the reporting mechanism.

**Anonymity**

When making a disclosure, you may do so anonymously. It may be difficult for SRA to properly investigate the matters disclosed if a report is submitted anonymously and therefore SRA encourages you to share your identity when making a disclosure, however you are not required to do so.

**Reporting to Regulators**

You may also make a disclosure to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) in relation to a Reportable Conduct. You will be covered by the protections outlined in this policy if you have reported your concerns to ASIC or APRA.

**INVESTIGATION**

SRA will investigate all matters reported under this policy as soon as practicable after the matter has been reported. An appropriate investigator will investigate the matter and where necessary, appoint an external investigator to assist in conducting the investigation. All investigations will be conducted in a fair, independent and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

**PROTECTION OF WHISTLEBLOWERS**

SRA is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

**Protection from Legal Action**

You will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation.

Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

**Protection against Detrimental Conduct**

SRA (or any person engaged by SRA) will not engage in ‘Detrimental Conduct’ against you if you have made a disclosure under this policy.

**Protection of Confidentiality**

All information received from you will be treated confidentially and sensitively.

If you make a disclosure under this policy, your identity (or any information which would likely to identify you) will only be shared where it is necessary to disclose information for the effective investigation of the matter, and this is likely to lead to your identification, all reasonable steps will be taken to reduce the risk that you will be identified.