

# WHISTLEBLOWER POLICY

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## 1 INTRODUCTION

### 1.1 Purpose and Scope

This document sets out CLP's Whistleblower Policy and what anyone should do if they notice any wrongdoing, to reassure them about expressing concerns and how to go about raising such concerns.

### 1.2 Background

Cornish Lithium Plc (**CLP**) is an innovative critical minerals company focused on the environmentally responsible extract of lithium from Cornwall.

CLP is committed to conducting business with honesty and integrity and expect all staff to maintain high standards in accordance with CLP's Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

This policy applies to all persons (**Persons**) working for CLP, or any subsidiary of or group entity of CLP (each a "**Group Company**"), or on CLP's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with CLP, wherever located. This policy does not form part of any employee's contract of employment.

CLP is the parent company and references to CLP extend to each Group Company.

### 1.3 Policy Aims

The aims of this policy are to:

- encourage Persons to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- provide Persons with guidance as to how to raise those concerns; and
- reassure Persons that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

### 1.4 Related Documents

- Grievance Policy as set out in the Employee Handbook;
- Insider Dealing Policy;
- Anti-Facilitation of Tax Evasion Policy;
- Code of Conduct; and

- Anti-Bribery Policy.

### **1.5 Personnel responsible for the policy**

The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Chairperson has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

The Chairperson, in conjunction with the Board and Executive Committee will review this policy from a legal and operational perspective at least once a year.

All Persons are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Persons are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Board.

### **1.6 Training Requirements**

All policies will be introduced to new starters a part of their induction Staff will be notified of any updates or reviews during the life of this policy.

## **2 WHAT IS WHISTLEBLOWING?**

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- financial fraud or mismanagement;
- breach of CLP internal policies and procedures, including Code of Conduct, Anti-Facilitation of Tax Evasion and Anti-Bribery;
- conduct likely to damage CLP's reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- negligence; and
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above.

## **3 RAISING A WHISTLEBLOWING CONCERN**

If you have any genuine concerns related to suspected wrongdoing or danger affecting any of CLP's activities (a whistleblowing concern) you should report it under this policy to CLP's Chairperson or the Independent Non-Executive Director, whose contact details are at the end of this policy. Additionally, if you are uncertain whether something is within the scope of this

policy you should seek advice from the Chairperson or the Independent Non-Executive Director.

CLP staff should not use this policy for complaints relating to personal circumstances, such as the way they have been treated at work. In such cases Staff should use the procedure set out in the Grievance Policy.

#### **4 CONFIDENTIALITY**

CLP hope that Persons will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, CLP will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

CLP do not encourage Persons to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Chairperson or the Independent Non-Executive Director and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

#### **5 INVESTIGATION AND OUTCOME**

Once you have raised a concern, CLP will carry out an initial assessment to determine the scope of any investigation and will inform you of the outcome of the assessment. You may be required to attend additional meetings to provide further information.

In some cases, CLP may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable CLP to minimise the risk of future wrongdoing.

CLP will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations, maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

#### **6 IF YOU ARE NOT SATISFIED**

CLP cannot guarantee the outcome you are seeking, but will deal with your concern fairly and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts set out in this policy.

## **7 EXTERNAL DISCLOSURES**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. CLP strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity Protect operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of CLP's staff, but they may sometimes relate to the actions of a third party, such as a supplier, contractor or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, CLP encourage you to report such concerns internally first.

## **8 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

It is understandable that whistleblowers are sometimes worried about possible repercussions. CLP aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chairperson or Independent Non-Executive Director immediately. If the matter is not remedied, you should raise it formally under CLP's Grievance Policy.

No one can threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

## **9 CONTACTS**

Acting Chairperson and CEO:	Jeremy Wrathall <a href="mailto:j.wrathall@cornishlithium.com">j.wrathall@cornishlithium.com</a>
Independent Non-Executive Director:	Janet Blas <a href="mailto:j.blas@cornishlithium.com">j.blas@cornishlithium.com</a>

Protect - Independent whistleblowing charity

Helpline: 020 3117 2520

Website: <https://protect-advice.org.uk/>