

Title: Whistleblower Policy

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Approved By:	Board	Cross Ref No:	PP-Ignite-HR-0001_ Code of Conduct PP-Ignite-HR-0002_ Equal Opportunity & Anti-Discrimination Policy PP-Ignite-HR-0003_ Bullying and Harassment Policy PP-Ignite-HR-0005_ Conflict of Interest Policy PP-Ignite-HR-0010_ Performance and Behaviour Management Policy PP-Ignite-HR-0011_ Disciplinary Policy & Procedure

1. Policy

- 1.1. Ignite Limited (the “Company”) is committed to the highest possible standards of lawful, ethical, and socially responsible business conduct.
- 1.2. In accordance with these standards, and the Company’s commitment to open communication, we provide an avenue for employees, past employees, contractors, suppliers, and family members of employees (‘Protected Persons’) to raise concerns and report unacceptable conduct.
- 1.3. This whistleblower policy sets out the Company’s commitment to maintaining an environment in which Protected Persons can report unethical, unlawful, or socially irresponsible conduct (‘Reportable Conduct’) without fear of victimisation.

2. Definitions:

Item	Definition
Board	Chair Board of Directors
BARCC	Chair Board Audit Risk & Compliance Committee
BRNC	Chair of the Board and Remuneration and Nomination Committee
CEO	Chief Executive Officer
FD	Finance Director
HR	Human Resources
ELT	Executive Leadership Team

3. Conduct Covered by Policy

Unacceptable conduct covered by this policy includes any conduct that is:

- 3.1. Dishonest, fraudulent or corrupt;
- 3.2. Illegal, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;
- 3.3. Unethical, such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Company’s Code of Conduct;
- 3.4. Potentially damaging to the Company or an the Company person such as unsafe work practices or substantial wasting of company resources;

- 3.5. Any other conduct that may cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company's interests; or
- 3.6. Any conduct that is a danger to public health and safety or in breach of ASX or other financial regulations.

4. Safeguards

4.1. Confidentiality

- 4.1.1. A Protected Person may advise that they wish to remain anonymous, or place restrictions on who knows their identity, and place restrictions on who is informed of their 'tip off'. We will comply with these requests unless we are compelled by law to share the information, or we consider it appropriate to make a disclosure to a regulator by law.
- 4.1.2. the Company nevertheless encourages employees and contractors to put their name to allegations because appropriate follow-up questions and investigations may not be possible unless the source of the information is identified.
- 4.1.3. Concerns expressed anonymously will be investigated, but consideration will be given to the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

4.2. Objectively reasonable grounds to suspect wrongdoing required

- 4.2.1. Protected Persons must have objectively reasonable grounds to believe Reportable Conduct has occurred or is occurring. If the employee (or other protected person) has such grounds, they will not be at risk of disciplinary action or reprisal for coming forward. It will not matter if a suspicion proves to be unfounded or real.
- 4.2.2. Please note: If the Protected Person raises an allegation of Reportable Conduct without objectively reasonable grounds, they may be subjected to disciplinary action.

4.3. Protection

- 4.3.1. Subject to section 4.2, the Company will take all reasonable steps to protect a Protected Person from retaliatory action as a result of making a disclosure of Reportable Conduct, including:
 - 4.3.1.1. Termination of employment, disciplinary action;
 - 4.3.1.2. Harassment or bullying
 - 4.3.1.3. Discrimination; or
 - 4.3.1.4. Any other conduct that constitutes victimisation or retaliation.
- 4.3.2. Any such retaliatory action will be treated as serious misconduct and dealt with in accordance with the Company's disciplinary process.
- 4.3.3. A Protected Person should inform HR if they believe they have been the subject of any retaliatory action. HR will investigate and provide recommendations to address such behaviour.

5. Procedure

5.1. Reporting

- 5.1.1. Serious concerns relating to financial reporting, unethical or illegal conduct or matters which could reasonably cause damage to the Company and its assets, should be reported to the CEO, FD BARCC and/or Board.

- 5.1.2. Serious employment-related concerns should be reported through to the CEO, FD, HR, BRNC and/or Board.
- 5.1.3. However, Protected Persons also have the right to report their concerns to their immediate manager or supervisor if they choose.

5.2. How the 'Tip Off' Will Be Handled

- 5.2.1. When a report of suspected unacceptable conduct is referred, initial inquiries will be made to determine whether an investigation is appropriate, and the form it should take. Some concerns may be resolved by agreed action without the need for investigation.

5.3. Report to employee/contractor who has given the 'Tip Off'

- 5.3.1. Whether reported to the CEO, FD, HR, BARCC, BRNC or Board the Protected Person will receive a follow-up on their 'Tip Off' within two weeks.
- 5.3.2. Follow-Up activity may include:
 - 5.3.2.1. Acknowledgment that the 'Tip Off' was received;
 - 5.3.2.2. An indication of how the matter will be resolved;
 - 5.3.2.3. An estimate of the time that it will take for a final response;
 - 5.3.2.4. Whether initial inquiries have been made.
 - 5.3.2.5. Whether further investigations will follow, if not, why not; and
- 5.3.3. The amount of contact between the Protected Person and the body investigating the 'Tip Off' will depend on the nature of the issue and the information provided.

6. Investigation

- 6.1. Where an investigation is required, the HR will conduct a preliminary review. If HR decides that the allegations raised should be investigated, they will commence an investigation or commission an appropriate staff member or external party to do so.
- 6.2. The HR will inform the Protected Person of their decision, unless they have remained anonymous. Where appropriate, they will also provide information about the progress of the investigation.
- 6.3. Investigations are to be conducted independently. Where appropriate, the subject of the allegations will be informed of the allegations against them and have an opportunity to respond.
- 6.4. HR will keep in touch with the Protected Person throughout the process (unless they have remained anonymous). HR's role will be to protect the Protected Person's wellbeing, and to consider any complaints of retaliation because of the disclosure and address any concerns about how their disclosure has been handled. HR will maintain the confidentiality of the Protected Person (where requested) and will escalate as appropriate.
- 6.5. All persons involved in the investigation will be protected from retaliation or victimisation.
- 6.6. HR or other investigator will provide a report setting out the findings on the allegations and a summary of the evidence. The report will make findings in relation to each allegation, which may be that the allegation has been fully substantiated, partially substantiated, is unsubstantiated, or is disproven. The Protected Person will be informed of the findings within one week of the report being completed but will not receive a copy of the report.
- 6.7. If allegations are substantiated against any person within the Company, their manager will be informed, and HR will be engaged to consider whether disciplinary action is appropriate. Any findings of possible criminal activity will be reported to the police and/or regulators.



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6.8. The investigation will be concluded if the Board is satisfied that the findings were appropriate. The Board may make recommendations to address any further concerns of the Protected Person but is not obliged to do so.

7. Availability of this policy

7.1. A copy of this policy will be made available to all staff via HR.