

ANTI-BULLYING AND ANTI-HARASSMENT POLICY

Andromeda Metals Limited (Andromeda) is committed to provide a work environment that is healthy, safe, secure and free from bullying, harassment, victimisation and discrimination. The highest standards of conduct are required of all employees and contractors regardless of position or seniority. Each employee is a representative of the Company and is expected to uphold these standards at work and when interacting with the community.

The purpose of this policy is to ensure that an open workplace is created where employees and managers understand their responsibilities with regards to acceptable behaviour, reporting and dealing with any complaints that are raised.

This policy applies to all stakeholders, employees, contractors, consultants and visitors on and off Company premises, and those working away from the office environment. This policy applies to behaviour that occurs:

- In connection with work, even if it occurs outside normal working hours.
- In relation to any neighbors or community interaction:
- During work activities, for example when dealing with clients.
- At work related events, for example at conferences and work-related social functions.
- On social media where workers interact with colleagues or clients and their actions may affect others either directly or indirectly.

Any form of bullying, discrimination and harassment will not be tolerated. These behaviours are disruptive to the well-being of our employees and can affect the performance and safety of everyone. Therefore, we are committed to the implementation of strategies to prevent such behaviour from occurring. All formal complaints of workplace bullying, discrimination and harassment are treated seriously and will be dealt with promptly, and confidentially.

Definitions

Bullying is when an individual or group of individuals repeatedly behaves unreasonably towards a worker or a group of workers at work, and the behaviour creates a risk to health and safety. Single incidents of unreasonable behaviour can present a risk to the health and safety of the worker and will not be tolerated.

Examples of bullying include:

- behaving aggressively towards others
- teasing or playing practical jokes
- pressuring someone to behave inappropriately
- excluding someone from work related events
- unreasonable work demands

Harassment is when a person is treated less favourably on the basis of certain personal characteristics, such as race, sex, pregnancy, marital status, breastfeeding, age, disability, sexual orientation, gender identity or intersex status. Harassment can include behaviour such as:

- sending explicit or sexually suggestive emails or text messages.
- displaying racially offensive or pornographic posters or screen savers.
- making derogatory comments or taunts about someone's race.
- asking intrusive questions about someone's personal life, including his or her sex life; and but not limited to.
- telling insulting jokes about particular racial group.

Sexual Harassment is any unwanted conduct:

- of a sexual nature which has the purpose or effect set out above (including, but not limited to,



- unwelcome sexual advances, requests for sexual favours and other such verbal or non-verbal, visual or physical conduct or behaviour); or
- which is related to sex or gender reassignment (whether with or without medical intervention); or
- which treats a person less favourably because a person has rejected, or submitted to, any such conduct.

Racial Harassment is any unwanted conduct having the purpose or effect set out above, which is related to colour, nationality, and ethnic or national origins.

Discrimination is when a person, or a group of people, is treated less favourably than another person or group because of their background or certain personal characteristics. Discrimination is also when an unreasonable rule or policy applies to everyone but has the effect of disadvantaging some people because of a personal characteristic they share.

Victimisation is subjecting or threatening to subject someone to a detriment because they have asserted their rights under equal opportunity law, made a complaint, helped someone else make a complaint, or refused to do something because it would be discrimination, sexual harassment or victimisation. It is also victimisation to threaten someone (such as a witness) who may be involved in investigating an equal opportunity concern or complaint.

What can you do?

All employees, contractors and visitors are to remain vigilant against all forms of bullying, harassment, discrimination and victimisation, and to raise a concern to an appropriate Company resource if they become aware of any bullying or harassment taking place.

Any employee or contractor who feels they have been unfairly treated under the terms of this policy is encouraged in the first instance to let the offender know how they feel and ask that they stop the offending behaviour. If an employee or contractor does not wish to approach the offender directly or if the matter remains unresolved, the issue should be escalated to their supervisor or manager. In addition, they can raise their concerns with the HR representative and seek assistance to cease or resolve the matter.

Breaches

Engaging in harassing, bullying or discriminating conduct in the workplace constitutes a breach of this policy and the Company's Code of Conduct policy. A breach may result in disciplinary action up to and including dismissal. In some instances, harassment, discrimination or workplace bullying may also amount to a criminal offence.

Related documents:

- Disciplinary and Grievance Procedure
- Code of Conduct

Governance

This policy has been approved by the Andromeda Metals Limited Board of Directors and the Executive Management Team are responsible for regularly reviewing the effectiveness of this policy.

Date:15 April 2021

Record of reviews and relevant changes or amendments and/or reasons below:

| Date | Version | Changes Made/Reasons for Changes | Changed By |
|------------|---------|----------------------------------|------------|
| 15.04.2021 | 1.0 | Adoption of Policy | Board |
| 12.09.2023 | 2.0 | Revision of Policy | SC |
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