

## Whistleblower Policy

### **Purpose**

To encourage employees and the public to disclose any misconduct of which they become aware in regards to BELAIR AFRICAN METALS's procurement, use, reporting and operations that contravene our **Conflict-free Minerals Policy**, and to provide protection for anyone who reports allegations of such misconduct.

### **Scope**

This policy applies to all employees, including full-time, part-time and temporaries, and agents, contractors, suppliers, customers, and to the general public.

### **Policy**

This whistleblowing policy is designed to encourage reporting of alleged misconduct, to ensure that all allegations are thoroughly investigated and suitable action taken where necessary. Any whistleblower is protected against adverse employment actions (discharge, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of business misconduct. Protecting must be given even if the allegations prove to be incorrect or unsubstantiated. Those who participate or assist in an investigation are also protected. Every effort will be made to protect the anonymity of the whistleblower, however there may be situations where anonymity cannot be guaranteed.

### **Whistle Blowing Procedures :**

#### **1. Reporting**

A person who reasonably believes that inappropriate conduct is occurring in regards to BELAIR AFRICAN METALS's activities should raise the issue with his/her manager or if this is considered inappropriate the issue should be raised with his/her senior manager. If the employee is not comfortable in reporting to his/her manager or senior manager the conduct or activity should be reported to the Designated Executive identified herein. It is the responsibility of the Designated Executive to initiate an inquiry.

All incidences of whistleblowing will be reported to the Designated Executive who in turn will escalate the incident to the Chief Executive Officer or Chairman if the initial investigation indicates inappropriate conduct has occurred.

#### **2. Investigation**

Once the claim of misconduct is made, the Designated Executive will respond to the whistleblower within 10 working days, setting out the intended investigation plan. An investigation may include internal reviews, reviews by external auditors or lawyers or some other external body.

When the investigation is complete, a company representative will inform the whistleblower of the results of the investigation as well as any corrective steps that are being taken.

Employees who believe they are being penalized in any way for whistleblowing or who believe that there has been cover up of the action disclosed or who do not consider that there has been a satisfactory response to their disclosure should write to the Chief Executive Office and/or Chairman stating facts that support their concern.

### **3. Safeguards**

If requested by the whistleblower all reasonable steps will be taken to protect the anonymity of the whistleblower. However under certain circumstances to assist with the investigation the whistleblower's identity may become known or needs to be revealed.

### **4. Disciplinary Action**

If the claim of misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of employment.

Any act of retaliation or victimization against the whistleblower will result in disciplinary action, up to and including termination of employment.

The malicious use of this whistleblowing policy will result in disciplinary action against the whistleblowing complainant, up to and including termination of employment.

### **5. External Disclosure**

Whilst internal disclosure is encouraged at all times an employee may be of the view that there is an exceptionally serious issue, which warrants reporting to an external body. This disclosure must be made in good faith and not for the purposes of personal gain.

#### **Designated Executive**

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