



GROUP POLICY STATEMENT

WHISTLEBLOWING

Andrada Mining's vision to be a global leader in sustainable mining requires the highest level of corporate governance and business ethics in our business activities to ensure that we meet the expectations of all our stakeholders. Andrada Mining requires and encourages the reporting of any actual or suspected unethical, illegal, fraudulent, and/or undesirable conduct.

At Andrada Mining we are committed to:

- Conducting business in an ethical, transparent, accountable, and fair manner in compliance with applicable laws, rules and regulations, Company policies and procedures, and other matters relating to fraud against our shareholders;
- Ensuring that those persons who make a report can do so without fear of retaliation, victimisation, disadvantage, or reprisal;
- Facilitating the detection, reporting, prevention, and eradication of instances of reportable conduct;
- Promoting a culture facilitating the disclosure of information.

The scope of reportable conduct is intended to be broad and comprehensive and to include any matter, which in the view of the complainant, is unethical, illegal, fraudulent, or undesirable. Examples of reportable conduct include but are not limited to:

- Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company;
- Fraud or deliberate error in the recording and maintaining of financial records of the Company;
- Deviation from full and fair reporting of the Company's consolidated financial condition;
- Violations or the risk of violation of any applicable laws or Company policies or procedures in relation to health, safety, or the environment;
- Violations of any applicable law, rule, or regulation that relates to corporate reporting and disclosure;
- Violations of the Company's Anti-Bribery and Corruption Policy, Harassment and Bullying Policy, Sexual Harassment Policy, Diversity Policy, Human Rights Policy, or Code of Conduct; and
- Discrimination, bullying, or harassment of any description.

REPORTING ALLEGED VIOLATIONS OR COMPLAINTS

The Board of Directors of Andrada Mining is responsible for ensuring that a confidential and anonymous process exists whereby persons can report any actual or suspected unethical, illegal, fraudulent, and/or undesirable conduct relating to the Company.

Any person wishing to report any actual or suspect misconduct should do so using the Company's confidential whistleblowing system (as described below) or alternatively communicate directly with any Executive Committee member or their relevant mine General Manager who will report any such breach to the Chairman of the ESG Committee (the "**Chairman**").

Andrada Mining has acquired the services of an independent service provider to receive both phone and web-based written reports. Any reports are managed by the independent, external service provider to ensure confidentiality and/or anonymity, as the complainant may desire, and are fed through to the Chairman.

The Chairman will review the details of any submissions and will determine the actions to be taken. If a submission is not made anonymously, the Chairman will notify the complainant of the proposed actions to be taken. The identity of the complainant will not be disclosed by the Chairman or the external service provider without consent. The Chairman (or if escalated by the Chairman, the Audit Committee) has ultimate responsibility for whistleblower-related concerns.

WHISTLEBLOWING SYSTEM

A report of reportable conduct may be made via the Andrada Mining Whistleblowing System, a free external reporting service administered and operated by an independent, external service provider.

This may be utilised as follows:

- By toll-free phone:
+27 (0)80 098 0167 (South Africa)
+264 (0)83 380 0102 (Namibia)
- By email:
AndradaMining@integritycounts.ca
- By web-based access:
<https://andradamining.com/> - See "Speak Up" icon in the footer
<https://app.integritycounts.ca/org/AndradaMining>



Anthony Viljoen
Chief Executive Officer

17/02/2023

Date