

# Whistleblowing Policy

## INTRODUCTION

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As a responsible exploration and mining company, Osino Gold Exploration and Mining (Pty) Ltd (Osino) upholds integrity, transparency, and accountability in all business conduct, backed by robust reporting mechanisms and protection for whistleblowers.

This policy, which aligns with Namibian regulations, is supported by our Code of Business Conduct and Ethics and our Anti-Bribery and Corruption Policy. Osino has a clear zero-tolerance approach to fraud, corruption, discrimination, and other unlawful or unethical behaviour.

All employees, partners, and stakeholders are encouraged and obliged to report any transgressions, from financial irregularities to breaches of environmental or legal standards. Dedicated processes ensure that serious and sensitive concerns - whether related to financial misconduct, breaches of Osino Policies, or concerns regarding business integrity - are thoroughly, fairly, and confidentially investigated.

## APPLICABILITY

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This Policy applies to all Osino employees, vendors (contractors, service providers and suppliers - including other third parties), and all stakeholders acting on behalf of Osino. Compliance with this Policy is mandatory, and all stakeholders must acknowledge receipt and adherence to the requirements of this Policy.

## COMMITMENTS

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### **Communication and dissemination of governance documentation**

Osino commits to implementing and maintaining processes to ensure that all employees, vendors (contractors, service providers and suppliers - including other third parties) have been informed about the following governance documentation and that they acknowledge and adhere to their specific compliance requirements:

- Whistleblowing Policy – this document
- Anti-Bribery and Corruption Policy
- Code of Business Conduct and Ethics

### **Reporting mechanisms**

Osino commits to having confidential and non-retaliatory mechanisms in place for reporting whistleblowing concerns. Reports can be made using these channels:

- Hotline: Namibia toll-free (0800 66 66 66), international (+264 81 124 5003)
- Email: [admin@sics.com.na](mailto:admin@sics.com.na)

To ensure anonymity and confidentiality, these channels are operated by Specialised Investigation Consultant Service, an independent whistleblowing service provider.

**Confidentiality and anonymity**

Reports can be made anonymously, and Osino commits to treating all whistleblowing reports with strict confidentiality. The identity of the whistleblower will only be disclosed with their explicit consent or if legally required. Any alleged incident will be treated safely and confidentially, and Osino will make all efforts to ensure whistleblowers remain free from reprisals or victimisation.

**Disclosure of improper conduct**

- Osino commits to ensuring that the whistleblower's anonymity is not compromised and that the whistleblower is not prejudiced. Prejudicial action may include:
- Subjected to disciplinary action
- Dismissed, suspended, harassed, intimidated or demoted
- Transferred involuntarily
- Refused a transfer or promotion
- Subjected to conditions of employment or retirement that were changed to his/her disadvantage
- Refused a reference or given an adverse reference
- Denied an appointment to any service or position
- Threatened with any of the above actions
- Otherwise adversely affected in respect of his/her service or position, including employment opportunities and work security

**VIOLATIONS AND REPORTING**

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Any violations of this Policy may result in contract termination, reporting to the authorities and legal action. Failure to report violations or environmental incidents may result in disciplinary action, contract termination or legal prosecution.

Employees, vendors, and other third parties must report concerns using one of the following:

- The Public Grievance Mechanism (see our website)
- The Whistleblower Mechanism (see our website)
- By contacting senior management

**MONITORING AND REVIEWING**

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Progress against these commitments will be monitored and reported annually to management. This Policy will be reviewed as necessary to reflect changes in legislation, regulatory requirements or related best practices. Osino reserves the right to amend or update this Policy as required.

Osino reserves the right to conduct audits and investigations where ethical concerns arise.

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**Tianhang Zhang**

Chief Executive Officer (CEO)

29 September 2025