



# ***WHISTLEBLOWING POLICY***

## ***2025-2026***





# ***WHISTLEBLOWING POLICY***

## ***Purpose***

At Mitchall Mines & Minerals, we are dedicated to fostering a culture of integrity, transparency, and ethical conduct throughout our operations. This Whistleblowing Policy ("Policy") provides a safe and clear process for employees, contractors, suppliers, and other stakeholders to report any suspected wrongdoing, unethical behavior, or illegal activities, without fear of retaliation.

## ***Applicability***

This Policy covers all employees, directors, officers, and representatives of Mitchall Mines & Minerals, as well as contractors, suppliers, agents, consultants, and any third parties acting on behalf of the Company. It also applies to any individual who becomes aware of misconduct linked to our business activities

## ***What is Whistleblowing?***

Whistleblowing involves reporting concerns about suspected unethical or unlawful conduct within the Company. Examples include, but are not limited to:

- Fraud or financial misreporting
- Bribery, corruption, or conflicts of interest
- Violations of health, safety, or environmental laws
- Workplace harassment, discrimination, or abuse
- Breaches of legal or regulatory obligations
- Retaliation against those who raise concerns

## ***How to Report Concerns***

To support confidential and secure reporting, Mitchall Mines & Minerals offers various channels:

- **Internal Reporting:** Employees and stakeholders are encouraged to raise concerns with their supervisor, Human Resources, or the Compliance Officer.
- **Anonymous Hotline:** A confidential phone line is available for whistleblowers who wish to remain anonymous.
- **Email:** Reports can be sent to a dedicated, monitored email address within the Compliance Department.
- **Online Portal:** A secure platform is provided for anonymous submissions.
- **External Reporting:** If internal processes are insufficient, reports may be directed to relevant regulatory bodies or law enforcement agencies.



## ***Protection Against Retaliation***

All whistleblowers will have their identity protected to the greatest extent possible. Mitchall Mines & Minerals strictly forbids any form of retaliation or discrimination against individuals who report concerns in good faith. Retaliatory actions will be met with disciplinary measures, up to and including dismissal or contract termination. While reports made honestly but found unsubstantiated will be protected, deliberately false or malicious reports may lead to disciplinary consequences..

## ***Handling of Reports and Investigations***

All reports will be handled with confidentiality and seriousness. The Compliance Department is responsible for managing investigations promptly and thoroughly, while safeguarding whistleblower anonymity. Findings and outcomes will be reported to relevant Company leadership as appropriate..

## ***Roles and Responsibilities***

- **Employees:** Are expected to report any suspected unethical or illegal conduct and cooperate fully during investigations.
- **Supervisors and Managers:** Must take all reports seriously and ensure whistleblowers are shielded from any form of reprisal.
- **Compliance Department:** Oversees receipt of reports, confidentiality, and conducts investigations, led by Linette Maurin.
- **Board of Directors:** Oversees the implementation and regular review of this Policy to maintain its effectiveness.

## ***Education and Awareness***

We commit to ongoing training for all staff regarding whistleblowing rights and procedures. Regular awareness programs will be conducted to reinforce understanding of reporting channels and protections.

***Drafted by:***  
***Approved by:***  
***Effective Date:***  
***Effective Through:***

Mrs. Linette Maurin  
The Board of Directors  
Thursday, April 27 2025  
Monday, April 25 2027





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