Albion Resources Limited

(ACN 620 545 664)

Whistleblower Protection Policy

Approved by the Board on 26th September 2025

1 Introduction

1.1 Commitment

This Whistleblower Protection Policy (***Policy***) has been adopted by the Board to ensure concerns regarding unacceptable conduct including breaches of the Company's Code of Conduct can be raised on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment. The Company is committed to creating and maintaining a culture of corporate compliance and ethical behaviour in which employees are responsible and accountable and behave with honestly and integrity as is set out in the Company's Statement of Values.

1.2 Purpose of this Policy

The purpose of this Policy is to promote responsible whistleblowing about issues where the interests of others, including the public, or of the organisation itself are at risk and also to set out the requirements for the management and investigation of any reports of improper conduct.

1.3 Who is covered by this Policy?

(a) This Policy applies to the Company's current or former, Directors and employees, the Company's contractors (including subcontractors) and employees of the Company's contractors, joint venture partners (who have agreed to be bound by the Policy) and suppliers (each a **Company Person**).

(b) This policy is available to officers and employees of the Company at https://albionresources.com.au/ and can also be obtained from an Authorised Officer listed in Schedule 1.

2 Conduct Covered by this Policy

The Company Persons are encouraged to report any conduct (whether actual or potential) which:

(a) represents a danger to the public;

(b) breaches any internal policy or code of the Group;

(c) constitutes dishonest, fraudulent, illegal or corrupt activity, including bribery;

(d) constitutes theft, drug distribution, sale or use, violence, assault, intimidation, criminal damage to property;

(e) constitutes harassment, discrimination, victimisation or bullying;

(f) is potentially damaging to the Group, its employees or a third party such as unsafe work practices, environmental damage, health risks or abuse of the Group's property or resources;

(g) may cause the Group financial loss, damage its reputation or be otherwise detrimental to the Group's interests;

(h) causes, or threatens to cause, Detriment to anyone because that person knows, believes or suspects that a Report has been, or might be, made under this Policy; or

(i) indicates any other misconduct or an improper state of affairs or circumstances in relation to a Group company.

3 Reporting and Investigating Unacceptable Conduct

3.1 Reporting of Unacceptable Conduct

(a) If a Company Person suspects that unacceptable conduct listed in Section 2 has occurred, then they should contact one of the Authorised Officers listed in Schedule 1.

(b) A Company Person can make a report by calling or emailing the Authorised Officers pursuant to the contact details listed in Schedule 1.

(c) In the event the report is in respect of the persons named above, the report should be made to the Board.

(d) The Company Person making the complaint will have the option of either:

(i) identifying themselves; or

(ii) remaining anonymous.

(e) For unacceptable conduct to be investigated, the Authorised Officer will require sufficient information to form a reasonable basis for investigation. For this reason, Company Persons should provide as much information as possible, in any form, about the alleged unacceptable conduct.

(f) This could include:

(i) the date, time and location;

(ii) the name(s) of person(s) involved and possible witnesses;

(iii) evidence of the events (eg documents, emails); and

(iv) steps the Company Person may have already taken to report the matter or resolve the concern.

3.2 Investigation

(a) Upon receiving a complaint, the Authorised Officer will determine who will investigate the matter. They cannot appoint anyone implicated directly or indirectly in the complaint.

(b) The investigation must be conducted:

(i) as soon as possible after the initial compliant is reported;

(ii) through the best endeavours of the Authorise Officer, in a timely, thorough, confidential, objective and fair manner;

(iii) as is reasonable and appropriate having regard to the nature of the unacceptable conduct and all of the circumstances.

(c) Where appropriate the Authorised Officer will update the Company Person on the progress of the investigation. Company Persons must keep confidential any details of the investigation, its progress or its outcome.

(d) An internal report on the outcome of the investigation, including any recommended actions, will be prepared by the Authorised Officer.

(e) The Company person will be informed of the outcome unless they have remained anonymous.

3.3 Outcome

(a) The outcome of the investigation may result in disciplinary action including but not limited to dismissal. Serious criminal matters will be reported to the police or the appropriate regulatory authorities.

(b) The Authorised Officer cannot be subject to legal liability for the report they produce.

3.4 Escalation

If the Company Person is dissatisfied with the outcome of the investigation they can escalate their matter to:

(a) the Board; or

(b) ASIC's Office of the Whistleblower.

4 Protecting Confidentiality and Privacy

4.1 Confidentiality

If a Company Person makes a report of unacceptable conduct under this Policy, and the Company is aware of that person's identity, the Company will make every reasonable endeavour to ensure that person's identity is protected from disclosure. The Company will not disclose the Company Person's identity unless:

(a) the Company Person making the report consents to the disclosure;

(b) the disclosure is required by law;

(c) the disclosure is necessary to prevent or lessen a serious threat to a person's health or safety; or

(d) it is necessary to protect or enforce the Company's legal rights or interests or to defend any claims.

4.2 Protecting the Company Person

(a) Company Persons who make complaints in good faith and who have not themselves engaged in improper conduct will not be personally disadvantaged by:

(i) dismissal;

(ii) demotion;

(iii) any form of harassment;

(iv) discrimination; or

(v) current or future bias.

(b) However, disciplinary action may be taken against an individual making malicious or vexatious allegations.

(c) The Company will take any action it considers necessary to protect the Company Persons and preserve the integrity of the investigation.

(d) Note the Company has no power to offer any person immunity against prosecution in the criminal jurisdiction.

5 General Reporting on Whistleblower Activity

The Company Secretary will prepare reports which contain a general summary of the number and type of incidents identified or complaints received through the Company's internal reporting processes, together with a description of the nature and results of any investigation conducted as a result of a reported incident or complaint.

These reports will be provided:

(a) to the Board at the end of any month where a report has been received by the Authorised Officer from the Company Person (or at a frequency to be determined by the Board from time to time); and

(b) to the Audit and Risk Committee (or the Board until such time that the Audit and Risk Committee is established by the Board).

6 Training

The Company's expectation in relation to the reporting of improper conduct are outlined as part of the new employee induction program and as part of ongoing training and awareness programs.

The Company will also provide training to the Authorised Officers to ensure they follow this Policy in responding to Complaints.

7 Welfare of Company Persons

The Authorised Officer will take reasonable steps to maintain processes to monitor the welfare of Company Persons who have made complaints under this Policy to ensure the effectiveness of the protections under the Policy.

8 Consequences of non-compliance

A breach of this Policy may result in prison time, significant fines under the Corporations Act and disciplinary action.

9 Review of this Policy

The Company Secretary will use the reports provided under this Policy to monitor and review regularly the effectiveness of the whistleblower protection program described in this Policy.

The Board is responsible for reviewing this Policy to determine its appropriateness to the needs of the Company from time to time.

This Policy may be amended by resolution of the Board.

10 Who to contact

Any questions relating to the interpretation of this Policy should be forwarded to the Company Secretary.

11 Glossary

ASX means ASX Limited ACN 008 624 691 or the securities exchange operated by it (as the case requires).

Authorised Officer means a person listed in Schedule 1 or any other person appointed by the Board from time to time.

Board means the Company's board of directors.

Chairman means the person appointed as the chairman of the Board from time to time.

Company means Albion Resources Limited (ACN 620 545 664).

Company Person means the Company's Directors and employees, the Company's contractors (including subcontractors) and employees of the Company's contractors, joint venture partners and suppliers.

Company Secretary means the person appointed as the company secretary of the Company from time to time.

Detriment includes (without limitation):

(a) dismissal;

(b) injury of an employee in his or her employment;

(c) alteration of an employee's position or duties to his or her disadvantage;

(d) discrimination between an employee and other employees of the same employer;

(e) harassment or intimidation;

(f) harm or injury (including psychological harm);

(g) damage to a person's property; and

(h) reputational, financial or any other damage to a person.

Director means the persons appointed as directors of the Company from time to time.

Group means the Company and each entity it controls.

Policy means this document or any amending or replacement document.

Schedule 1

Authorised Officers

Name	Position	Contact Details
Steven Formica	Executive Chair	+61418920474
David Palumbo	Non-Executive Director, & Company Secretary	+61408947562