

Grievance Handling Policy

1 Policy Statement

At Magnetite Mines Limited (“the Company”) we aim to foster good relations amongst employees, and between employees, other workers and management. We recognise that satisfaction is reflected in level of engagement, job performance and how well colleagues relate to each other and to Company stakeholders.

To that end, this Grievance Handling Policy (“the policy”) is intended to facilitate the resolution of disputes and issues that arise in the workplace.

This policy does not form part of your employment contract, or contract of engagement, with the Company and may be updated at any time. In so far as this policy imposes any obligations on the Company, those obligations are not contractual and do not give rise to any contractual rights.

2 Application of Policy

Employees and, as applicable, contractors of the Company may use the process set out in this policy in relation to employment or work-related concerns or grievances as outlined below.

A grievance under this policy may relate to or involve:

- (a) safety in the workplace, including both physical and psychological safety;
- (b) discrimination;
- (c) harassment;
- (d) bullying; and/or
- (e) workplace aggression or violence.

A grievance under this policy will generally exclude a decision by the Company to:

- (a) engage in a performance improvement process or performance counselling with an employee (including with respect to the process adopted);
- (b) take disciplinary steps against an employee (including with respect to the nature of the steps taken);
- (c) suspend or terminate a person’s employment; and/or
- (d) change or withdraw any discretionary benefit available to you in your employment or engagement.

Please note this policy will not prevent or delay the Company from taking any action that it considers is necessary to deal with an emergency or other situation requiring immediate action.

3 Principles relating to grievance handling

The Company is committed to the promotion of health, safety and wellbeing in the workplace and to facilitating an environment that allows everyone to perform to the best of their ability. Accordingly:

- (a) grievances received by the Company will be taken seriously and handled impartially having regard to the circumstances of the grievance;
- (b) the Company encourages all employees (and contractors, as applicable) to provide as much information as possible in respect of any grievances raised. The Company will assess all grievances based on the material available; an issue will not be dismissed solely because no one else witnessed the conduct. However, where there are no witnesses to alleged conduct, the Company may ask for further information to assess how to approach this;
- (c) as a general rule, the Company will endeavour to handle and resolve grievances as expeditiously as possible. To this end, the Company will deal with all grievances in a timely manner having regard to the circumstances of the grievance, in line with the processes set out below; and
- (d) the Company's policy regarding confidentiality of matters raised and our zero-tolerance approach to victimisation is outlined below in this policy.

4 How can grievances be raised or reported?

If you have a concern, grievance or complaint in relation to your employment with or work for the Company, you are encouraged to take any of the following steps:

- (a) Attempt to resolve the grievance with the person/s involved.
If you feel comfortable in doing so, a grievance may be addressed by raising the matter with the person/s involved and asking them to stop/change the behaviour/conduct in issue. In some cases, the other person/s may not realise the effect their behaviour is having on you and your feedback may give them opportunity to change their actions and/or redress the situation. However, this may not be appropriate in all cases, particularly if you do not feel comfortable speaking to the person/s or if you have already attempted to do this unsuccessfully.
- (b) Speak to your manager and report the grievance to them.
If the above step is not successful or if you do not feel comfortable speaking to the person/s involved directly, you should speak to your manager or provide your manager with a written outline of your concerns as soon as possible after the issue arises. However, this may not be appropriate in all cases, including if your grievance is about your manager.
- (c) Report the grievance to senior management.
If the step/s above is/are not successful or if you do not feel comfortable discussing your concerns with your manager or if your concern or grievance relates to your manager, you should speak to the Financial Controller or the Chief Executive Officer, as soon as possible after the issue arises. You may also provide senior management with a written outline of your concerns.

5 How will grievances be handled?

On receipt of a grievance, the Company will determine what process will be taken with respect to the consideration, investigation and/or resolution of the matter.

In some cases, you may be asked to provide further details in respect of the grievance or issue reported, which may include asking you to provide a written outline of your concerns.

Where possible, you will then be provided with an overview of the process the Company proposes adopting and the likely timeframe attached to that process. By way of example, that process might involve:

- (a) meeting with you to discuss and try to resolve the issue; and/or
- (b) conducting an investigation, or engaging an external investigator to conduct an investigation, into your concern or grievance.

6 Support persons

Any person involved in an investigation or grievance handling process may discuss the grievance with a designated support person (see the Company's Support Person Policy for more details) and bring their support person to any meeting, provided their support person or representative also maintains confidentiality (see below).

7 No victimization

Victimisation occurs when a person is treated less favourably or is subject to some other detriment because:

- (a) they make, or propose to make, a genuine complaint of unacceptable or unlawful behaviour; or
- (b) they are involved in a complaint process or investigation (for example, as a witness).

Victimisation is unlawful and will not be tolerated under any circumstances. This means that you must not retaliate against a person or subject them to any detriment because they have lodged a complaint, may lodge a complaint or are otherwise involved in a complaint or investigation process.

Any person who is found to have engaged in victimisation may be subject to disciplinary action, up to and including termination of their employment or engagement.

8 Grievances must only be raised/reported in good faith

Complaints and grievances notified under this policy must be genuine and raised in good faith. You must not make complaints or raise grievances that you know are false or misleading. A person who makes an unfounded or vexatious complaint/grievance may be subject to disciplinary action, up to and including termination of their employment or engagement.

9 Confidentiality

If you make a complaint or if you are involved in a grievance handling process in any way (including as a witness), you must keep the nature of the grievance, the identity of the people involved and details of your involvement confidential at all times.

Gossiping and/or spreading rumours in connection with a complaint or a breach of this policy will not be tolerated under any circumstances and may lead to disciplinary action being taken against those concerned.

The Company will maintain confidentiality to the extent that is possible. Despite this, it may be necessary for the Company to discuss a complaint with other people in order to investigate and address the matters in issue. This might include for example, witnesses, managers, any external investigator and/or external advisors. If the conduct in question is, or could be, illegal the Company may also notify the appropriate authorities.

10 What are the possible outcomes?

If, as a result of a grievance, the Company is satisfied that an employee has engaged in misconduct

or has breached a Company policy, the Company will take disciplinary steps as it considers appropriate. This could include termination of employment. In the case of contractors, this may include termination of engagement.

For employees, see the Company's Discipline & Termination Policy for more detail.

11 Other policies, additional information and support

This policy should be read in conjunction with other relevant Company policies, including:

- (a) Code of Conduct.
- (b) EEO, Anti-Discrimination, Harassment and Bullying Policy;
- (c) Support Person Policy; and
- (d) Discipline & Termination Policy.

Any questions about this policy, or requests for support or guidance should be directed to your manager or the Chief Executive Officer.