



BURGUNDY
DIAMOND MINES

BDM POL – WHISTLEBLOWER PROTECTION POLICY

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Related Documents:	Code of Conduct and Business Ethics
Key Contacts:	Corporate Secretary
Change Requests:	Corporate Secretary
Brief Description:	This policy provides a process for disclosing complaints or concerns regarding financial matters, certain adverse employment actions, and other matters including violations of the Code of Ethics and Business Conduct. This policy provides information on how and where to submit a complaint or concerns, who deals with the complaint and how that complaint is expected to be handled and processed. This policy also describes the standards and principles that are expected to govern the processing of complaints and concerns, whether they are received from people within the Company or external parties.



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1.0 SCOPE

This Whistleblower Protection Policy (the “Policy”) is implemented by the Board of Directors (the “Board”) of Burgundy Diamond Mines (the “Company and applies to the Company, its subsidiary or affiliated companies (collectively, the “Company”), and to any known or suspected financial and ethical irregularities involving employees as well as directors, shareholders, consultants, vendors, contractors, and/or any other parties in a business relationship with the Company.

This Policy applies globally. To the extent that local laws, codes of conduct or other regulations (Local Laws) in any countries are more rigorous or restrictive than this Whistleblower Policy, those Local Laws should be followed by any subsidiary operating in that country. Where a country has specific Code of Ethics and Business Conduct Local Laws which are less rigorous than this Policy, this Policy prevails. The Company may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

2.0 OVERVIEW

The reputation of the Company for acting ethically and responsibly in all our dealings, both internally and externally, plays a critical role in our success as a business. The integrity of our officers, and the financial and other material information of the Company is vital. Our financial and other material information guides the decisions of the Board, and is relied upon by our shareholders, financial markets, and other stakeholders. The fair and accurate reporting of all financial and other material information regarding the Company and its transactions and events is of paramount importance and we will not tolerate fraud or misrepresentation of any kind.

The Company recognizes that all our employees are individually accountable for helping to maintain our reputation and the integrity of our officers, and the financial and other material information we disclose. The Company encourages employees who have concerns or suspect any violations of our Code of Ethics & Business Conduct to raise them with the appropriate people.

As communicating a concern regarding unethical behaviour can be a sensitive matter, a formal "whistleblower hotline" has also been established which is available to all Company employees. This hotline provides a formal, simple, and safe channel to report concerns regarding fraud or significant ethical issues relating to Company or individual conduct and brings such issues to the attention of the Board, and if appropriate, the Chief Executive Officer and Chief Financial Officer. We want to ensure that employees can raise a concern confidentially and anonymously and be confident that these concerns will be heard and appropriately investigated without fear of retribution.



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This Policy outlines the process available within the Company; nothing herein shall be read or construed to prohibit or impede any person from communicating directly with appropriate regulators concerning a potential violation of securities or other laws.

3.0 WHISTLEBLOWER PROGRAM

Concerns to Report

Employees are urged to report concerns about matters which:

- a) are ethically questionable;
- b) threaten the integrity of our officers or the integrity of financial and other material information of the Company; or
- c) violate the *Code of Ethics & Business Conduct*.

Reporting a Concern

Employees should first consider raising any concern directly with the employee's supervisor and a member of the Senior Leadership Team.

Should employees be more comfortable reporting concerns via a confidential and anonymous channel, employees may access the independent and external hotline, **ConvercentbyOneTrust**:

<https://app.convercent.com/en-us/Anonymous/IssueIntake/IdentifyOrganization>

ConvercentbyOneTrust is available twenty-four (24) hours a day, seven (7) days a week:

Toll free number: 1-800-461-9330

On the internet: <https://app.convercent.com/en-us/Anonymous/IssueIntake/IdentifyOrganization>

Making a Report using ConvercentByOneTrust webpage:

On accessing landing page Use the Report an Incident section and start by completing the subsection "First, find your organization". Type in **Burgundy Diamond Mines** and this will lead you to the Options page.

Receipt of Reports

A designated board and executive member are instantly notified of any reports submitted to **ConvercentbyOneTrust** provided that if one of them is implicated in the complaint, they will not receive notice of it.



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The designated board and member may refer the report to an independent advisor at his or her discretion for the purposes of undertaking investigations in accordance with this Policy.

Investigations

The designated board and executive member, as applicable, will initiate the appropriate investigations based on the whistleblower reports it receives. All reports will be dealt with promptly. In the event that the designated board and executive member is implicated in a report, he or she will be excluded from receipt of the report, all related discussions, investigations and decisions on the outcome of such report. All information reported and disclosed during the course of an investigation will remain confidential and made available only on a need to know basis, except as necessary to conduct the investigation and to take any remedial or disciplinary action, and subject to any applicable law (that can compel disclosure in some circumstances).

Subject to any legal constraints, the designated board and executive member, as applicable, will provide the complainant with appropriate information about the outcome of any investigation within a reasonable period of time (except in cases where the report was sent anonymously).

Oversight and Control

The Audit Committee of the Board is responsible for the integrity of financial reporting and overseeing the system of internal controls implemented by the Company to prevent and detect fraud. As such, the Chair of the Audit Committee will receive a summary of all complaints, investigations and findings of any investigation completed. The designated board and executive member will also report the findings of any investigation completed by it to the Chief Executive Officer and Chief Financial Officer. This will be done in order to advise them of the disposition and/or to ensure appropriate resolution to the concern.

4.0 EMPLOYEE PROTECTION

Any employee reporting these concerns will be protected from potential adverse personal impacts associated with filing a complaint.

The Company strictly prohibits retaliatory actions or threats against any employee who, in good faith, reports a possible violation via either formal or informal whistleblowing channels. Retaliation or threatened retaliation for reporting possible violations in good faith will result in discipline up to and including termination of employment. Furthermore, no employee will be adversely impacted for reasonably refusing to carry out a directive which they consider to be in violation of our Code of Ethics & Business Conduct.

However, in recognizing the significance of this Policy, reporting intentionally false accusations will result in disciplinary action which may include termination.



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5.0 QUESTIONS ABOUT THIS POLICY

Should employees have any questions or concerns regarding this Policy, please contact the Company's Corporate Secretary, CEO or CFO.

6.0 CHANGES TO THE POLICY

The Policy is not intended to give rise to civil liability on the part of the Company or its directors, officers, employees or other insiders to shareholders, investors, customers, suppliers, competitors, employees or other persons, or to any other liability whatsoever on their part. The Policy may be amended by the Board at any time.



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APPENDIX - APPROVALS

REVIEWER ROLE	NAME	SIGNATURE	DATE
Board Chair	Michael O’Keeffe	DocuSigned by: 4A7A3C5577D4431...	
Human Resources & Compensation (HRCC) Committee Chair	Marc Dorion	DocuSigned by: 19251FE747A246E...	
Chief Executive Officer & Managing Director	Kim Truter	DocuSigned by: 8F8AA974DFB24DD...	
Chief Financial Officer & Company Secretary	Brad Baylis	DocuSigned by: 533B8739340A4A2...	
Vice President Corporate Development	Eric Ingle	DocuSigned by: 746B9FA35FE945A...	