



Working with Integrity Policy



SYRAH RESOURCES

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Syrah Resources Limited (“Syrah” or “the Company”) is an Australian Securities Exchange listed industrial minerals and technology company with its flagship Balama Graphite Operation in Mozambique and a downstream Active Anode Material Facility in the United States. Syrah’s vision is to be the world’s leading supplier of superior quality graphite and anode material products, working closely with customers and the supply chain to add value in battery and industrial markets.

Syrah is committed to maintaining the highest standards of conduct in all of its business activities by promoting a culture of integrity, transparency and responsible corporate governance. To meet this commitment we strive to ensure that robust systems are in place to enable our people to work with integrity and fairness, in line with our Company Values.

At Syrah, we act with integrity by:

- Training our people in all Company policies and standards that underpin our commitment to working with integrity, including but not limited to:
 - The Company Values
 - Code of Conduct
 - Anti-Bribery and Corruption Policy
 - Whistleblower Policy
 - Workplace Behaviour Policy
 - Sustainability Policy
 - Human Rights Policy and Modern Slavery Statement
 - Diversity and Inclusion Policy
 - Securities Trading Policy
- Maintaining leading practice Environmental, Social & Governance (“ESG”) standards to protect the health and safety of our people, preserve the natural environment and continue to strengthen our relationship with the communities in which we operate.
- Supporting our people to conduct business in compliance with the applicable laws in each of the Company’s operating jurisdictions by ensuring that appropriate legal governance mechanisms are in place.
- Maintaining an ethical, diverse and inclusive organisational culture where all employees are afforded a safe and productive work environment free from bullying, harassment and other forms of inappropriate behaviour.
- Ensuring processes exist, and are widely communicated, to facilitate the reporting and investigation of suspected breaches of Company policy.
- Ensuring that there are appropriate systems, policies and procedures in place to mitigate the risk of bribery and/or corruption, and protect employees and the Company from the risk of conflicts of interest or improper influence (actual, potential or perceived).
- Providing whistleblower protections to ensure employee and stakeholder confidence that any suspected breach of Company policy is reported freely and investigated thoroughly.
- Maintaining robust, transparent and auditable procurement processes that promote open competition and ensure integrity and fairness in all business dealings.
- Fostering a culture of proactive and responsible risk management.
- Providing employee assistance programs to protect the health and wellbeing of our people.
- Maintaining accurate, transparent and auditable business records to demonstrate robust corporate governance.

- Monitoring performance and seeking continual improvement in understanding and meeting Company requirements for governance, compliance and workplace behaviour.
- Reporting performance regularly to the Board of Directors and applicable Sub-committees to ensure good governance, compliance, identification of material risks and alignment with the strategic objectives of the Company.

Syrah Resources Limited			
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Authorised Reviewer(s)	Syrah Leadership Team (SLT) and Executive Committee (ExCo)
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