



Working with Integrity Policy



SYRAH RESOURCES

www.syrahresources.com.au

enquiries@syrahresources.com.au

03 9670 7264

CONTENTS

1. INTRODUCTION.....	2
2. PURPOSE.....	2

1. INTRODUCTION

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.

2. PURPOSE

This Policy of Syrah Resources Limited (“**Syrah**”) and its subsidiary companies (the “**Company**”) describes the Company’s mandatory compliance requirements in relation to working with Integrity. Syrah is committed to maintaining the highest standards of conduct in all 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.

2.1 Policy Statement

It is the policy of the Company to conduct its business with integrity by training our people in all Company policies and standards that underpin our commitment to working with integrity.

Policies considered include but are 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

2.2 Basic Tenets

The basic tenets of this Policy are:

- 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 that processes do 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			
Title	Working with Integrity Policy		
Level of Confidentiality	Group Policy	Revision	5
Document Status	IFU	Language	English
Last Review	March 2024	Next Review	March 2025

This Revision	
Author(s)	Maddy Grochowski – GM People & Sustainability
Authorised Reviewer(s)	Syrah Leadership Team (SLT) and Executive Committee (ExCo)
Authorised Approver	Remuneration, Nomination & Governance Committee (RNGC) and Board of Directors (BoD)
Legal Review	Andrew Komesaroff – General Counsel
Document Control	Jemma Pititto – Executive Assistant

Revision History						
Author(s)	Reviewer(s)	Approver(s)	Revision Number	Status	Revision Date	Description
J. Morrissey	S. Verner	SC & BoD	0	Superseded	Mar 2017	New Policy
J. Morrissey	S. Verner	SC & BoD	1	Superseded	Apr 2018	Revision
J. Morrissey	S. Verner	SC & BoD	2	Superseded	Oct 2019	Revision
M. Grochowski	SLT & ExCo	SC & BoD	3	Superseded	Sep 2022	Revision
M. Grochowski	SLT & ExCo	RNGC & BoD	4	Superseded	Mar 2023	Revision
M. Grochowski	SLT & ExCo	RNGC & BoD	5	In Use	Mar 2024	Revision