



Working with Integrity Policy



SYRAH RESOURCES

www.syrahresources.com.au

enquiries@syrahresources.com.au

03 9670 7264

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.

PURPOSE

The purpose of this policy is to outline Syrah’s minimum requirements in relation to working with integrity. The Company 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 act with honesty, fairness and respect for others, in line with our Company Values.

Policy Statement

The Company is committed to conducting its business with integrity by providing workforce training in all Company policies and standards that underpin our commitment to working with integrity.

Policies considered include but are not limited to:

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Whistleblower Policy
- Workplace Behaviour Policy
- Sustainability Policy
- Human Rights Policy
- Modern Slavery Statement
- Diversity and Inclusion Policy
- Securities Trading Policy

Basic Tenets

The basic tenets of this Policy are:

- Maintaining leading practice Environmental, Social and Governance (“ESG”) standards to protect the health and safety of our people, preserve the natural environment and continue strengthening our relationship with the local communities.
- Supporting our people to conduct business lawfully in each of the Company’s operating jurisdictions by ensuring that appropriate 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 accessible grievance mechanisms 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 and ensuring they are widely communicated to employees and stakeholders, building 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 best practices for governance, compliance and workplace culture.
- 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	6
Document Status	In Use	Language	English
Last Review	July 2025	Next Review	July 2026

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	Superseded	Mar 2024	Revision
M. Grochowski	ExCo	RNGC & BoD	6	IFU	Jul 2025	Revision