Whistleblower Protection Policy

1. Purpose of the Policy

Denison is committed to conducting business activities with integrity and to supporting an internal culture of honest, ethical and socially responsible behaviour, corporate compliance and corporate governance.

To support these objectives and Denison's long-term sustainability and reputation, we encourage speaking up and reporting conduct which is inconsistent with these values or which may be unlawful.

Denison recognises that this Whistleblower Protection Policy is an important element in detecting corrupt, illegal or other undesirable conduct.

This Whistleblower Protection Policy sets out our commitment:

- to encourage speaking up and the reporting of any actual or suspected instances of wrongdoing involving the Group's business;
- to ensure that individuals who disclose such wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to help deter wrongdoing, in line with Denison's risk management and governance framework;
- to ensure that reports are dealt with appropriately and timeously; and
- to provide transparency around Denison's framework for receiving, handling and investigating reports.

It explains:

- what types of matters are reportable;
- how to make a report;
- how Denison will respond; and
- what protections are available to whistleblowers under this Policy and the law.

2. Application of this Policy

This Policy applies and protects to anyone who is or has been:

- a director, an officer, or a full-time, part-time or casual employee (collectively **Denison Personnel**);
- a contractor, consultant or agent;
- a supplier, joint venture partner, or one of their employees or secondees; or
- a relative[1], dependant[2] or spouse of the above.

[1] A relative in relation to a person, means the spouse, parent or remoter lineal ancestor, child or remoter issue, or brother or sister of the person.
[2] Includes a dependant of the spouse.

Denison requires that its Personnel comply with this Policy. Any Denison Personnel who in any way retaliates against a whistleblower for making or intending to make a report under this Policy will be subject to disciplinary actions (including possible termination of employment).

A breach of this Policy may have serious consequences including civil and criminal penalties.

3. What is Reportable Conduct?

Reportable Conduct is any suspected or actual misconduct, improper state of affairs or circumstances in relation to Denison, its business activities and Denison Personnel.

Examples of Reportable Conduct include:

a. practices or behaviours which are dishonest, fraudulent or corrupt, including bribery;

b. illegal activities such as theft, violence, harassment or intimidation, criminal damage to property;

c. behaviour which is unethical or in violation of Denison's policies such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching Denison's Code of Conduct or other policies or procedures;

d. human trafficking and modern slavery in Denison's operations or supply chain;

e. actions to conceal Reportable Conduct;

f. conduct which is potentially damaging to Denison, Denison Personnel or a third party, such as being under the influence of drugs or alcohol and other instances which may lead to unsafe work practices, environmental damage, health risks or abuse of Denison's property or resources;

g. conflicts of interest, including those relating to outside business interests, relationships, improper payments and donations;

h. concerns that relate to matters which represent a danger to the public or the financial system, even if it does not involve a breach of a particular law;

i. conduct which involves harassment, discrimination, victimisation or bullying (other than personal work-related grievances - see below);

j. information about Denison and its Personnel which indicates conduct or alleged conduct which constitutes an offence against or contravenes corporate and financial services laws[3] or would result in an offence punishable by 12 months or more imprisonment under any Commonwealth law or would represent a danger to the public or the financial system;

k. behaviour which involves any other kind of misconduct, including negligence, breaches of trust and breaches of duty, or an improper state of affairs or circumstances; and

l. conduct which is prescribed by regulation.

In some cases, disclosures of Reportable Conduct will also be protected by the laws such as the *Corporations Act 2001* (Cth), the *Taxation Administration Act* (Cth) and the *Fair Work Act 2009*

[3] *Corporations Act 2001 (Cth); Australian Securities and Investments Commission Act 2001 (Cth); Banking Act 1959 (Cth); Financial Sector (Collection of Data) Act 2001 (Cth); Insurance Act 1973 (Cth); Life Insurance Act 1995 (Cth); National Consumer Credit Protection Act 2009 (Cth); Superannuation Industry (Supervision) Act 1993 (Cth) and instruments made under these Acts.*

(Cth). For example, reports in respect of "disclosable matters" under the *Corporations Law* - see a, b, g, i, j and k above - will qualify for protection under that law. Other reports will not be protected by the *Corporations Law* but will be protected under this Policy and may be protected under other laws. More information on statutory protections is available below in section 8 and Attachment 1.

A grievance which involves Reportable Conduct will be treated as a matter under this Policy and may also qualify for legal protection.

Reportable Conduct generally does not include personal work-related grievances which are matters with a personal implication such as interpersonal conflicts, promotion decisions and disciplinary actions which do not relate to any Reportable Conduct, i.e. that do not relate to detriment or threat of detriment to the person making the report[4]. Personal work-related grievances can be raised with your manager or Denison's HR Manager in the first instance.

4. When should I make a report?

Denison encourages anyone to make a report (**reporter**) if there are reasonable grounds to suspect that Reportable Conduct has occurred - it does not have to involve a breach or contravention of any law.

A person who makes a report in good faith may qualify for protection even if their disclosure turns out to be incorrect. Good faith is evident when the report is made without malice or consideration of personal benefit and you have a reasonable basis to believe that the report is true. However, a report made in good faith does not have to be proven to be true.

Employees have a duty to report if they are aware of Reportable Conduct as Reportable Conduct can impact the long-term sustainability and reputation of Denison and so that Denison can take appropriate steps to deter future misconduct.

Similarly, a false report of Reportable Conduct could significantly affect Denison's reputation and the reputations of officers and other staff members, with the potential for wasted time and effort. Accordingly, any deliberately false reporting of a Reportable Conduct, whether under this Policy or otherwise, will be treated as a serious disciplinary matter.

5. Advice and Information

Anyone considering making a report or wanting advice about this Policy and the protections available for whistleblowers can approach Denison's General Counsel, Compliance Officer or HR Manager. This includes information or advice on:

- support that Denison can provide to protect against retaliation and for well-being;
- the escalation process if concerns have not been responded to in accordance with this Policy or where retaliation or detriment has occurred; and

[4] To be raised in accordance with the Grievance Procedure, i.e. reports that do not (a) have any other significant implications for Denison (or another entity) or (b) relate to any conduct, or alleged conduct, about a disclosable matter. Examples include but are not limited to an interpersonal conflict between the reporter and another employee; a decision relating to the engagement , transfer or promotion of the reporter; (c) a decision relating to the terms and conditions of engagement of the reporter; (d) a decision to suspend or terminate the engagement of the reporter, or otherwise to discipline the reporter.

- further sources of information about the protections available to whistleblowers under the law.

6. Who Can I Make a Report To?

Denison seeks to identify and address any wrongdoing as early as possible.

For most issues, you will likely be comfortable discussing your concerns informally with your manager or another trusted person within the business and Denison encourages you to continue to feel empowered to raise issues in this way. Denison is committed to the creation of a supportive workplace environment and it seeks to create a culture where concerns can be discussed openly and transparently. However, please note that informally raising concerns outside of this Policy may limit the protections that you are entitled to under the law, which are summarised below in Attachment 1.

To ensure appropriate escalation, whistleblower protection and timely investigation, Reportable Matters can be reported to an internal Eligible Recipient and/or to an eligible external party.

6.1 Reporting to an internal Eligible Recipient

An **internal Eligible Recipient** is any of the following authorised individuals:

- Any of the Whistleblower Protection Officers (as defined in section 8 below);
- The HR Manager;
- Any of Denison's Officers (including any of the Directors, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Chief Commercial Officer, or Company Secretary).

Reports can also be made to Denison, either anonymously or disclosing your identity, as follows:

By email – WPO@denisongas.com.au
This email will be received simultaneously by the Whistleblower Protection Officers only.

By anonymous telephone - (+61) 2 7909 8080 (Australia)

This call will be received as voicemail and forwarded simultaneously to the Whistleblower Protection Officers only.

By completing a Form on Denison Hub (Denison Personnel only) -
https://forms.office.com/r/0ChV10sm9j

This form will be forwarded to the Whistleblower Protection Officers only.

6.2 Reporting to an external recipient

A reporter can also make a report to **external parties** as described in Attachment 1 below.

6.3 Reporting by external parties

The Denison website includes instructions how a reporter who is not a Denison Employee can make a report, at Whistleblowing – Denison Gas. An external reporter can make a report using email and/or telephone as described in section 6.1 but does not have access to the Denison Hub form.

7. What Information do I Need to Provide in my Report?

Denison encourages a report to include all available information about the Reportable Conduct in order to provide a reasonable basis for investigation wherever possible. This may include any known details about the event(s) underlying the report, such as:

- Date;
- Time;
- Location;
- Name of the person(s) involved;
- Possible witnesses to the events;
- Other evidence of the events (e.g. documents, emails); and
- Any other relevant information including occurrences after the Reportable Conduct.

You should also tell us about steps you have taken previously to report the matter elsewhere or resolve the concern.

8. Stakeholders and Responsibilities

The Board	Approves this Policy and procedures and any updates. Receives regular periodic reports on whistleblowing matters. Reviews the effectiveness of the Policy.
Audit & Risk Committee (ARC)[5]	Is the custodian of this Policy. Reviews the adequacy and effectiveness of this Policy and of arrangements for concerns to be safely raised, independently investigated and appropriately followed up on. Reviews the effective communication of this Policy to Denison Personnel. Reports to the Board on incidents under this Policy. Responsible for oversight of and monitoring the Policy.
Chief Executive Officer (CEO)[6]	Owner of this Policy.
Whistleblower Protection Officer (WPO)	Is any of the ARC Chair, General Counsel, Compliance Officer or Company Secretary. Acts as adviser and is responsible for: • providing information and assistance to reporters or people considering reporting; • periodically reviewing and updating the Policy, processes and procedures and for implementing the Policy and any changes; • ensuring the integrity of the reporting mechanism; • progressing reports and ensuring timely investigations and responses; • reporting to the CEO, the ARC and the Board on this Policy, incidents and investigations; and

[5] This is a summary. The responsibilities are fully described in the Audit & Risk Committee Charter.

[6] The Chief Executive Officer is the person performing the chief executive function as defined in sub-sections 295A(4) and (5) of the Corporations Act, irrespective of the title. The Managing Director is assumed to hold such duties.

	• providing guidance to WIO on practical steps to protect reporters from detriment.
Whistleblower Investigation Officer (WIO)	Is an authorised and impartial investigator who is independent of the business area concerned and of any person who is the subject of the Reportable Conduct. Is any of the ARC Chair, General Counsel, Compliance Officer or Company Secretary, or a deputy. Carries out or supervises the investigation. Reports on investigations to the WPO and the Audit & Risk Committee. The ARC Chair supervises the investigation of reports of improprieties in matters of financial reporting and other financial misconduct.
HR Manager	Supports training, education and communications about the policy. Supports investigations.
Eligible Recipient	The persons listed in section 6. Ensures that a Reportable Matter is forwarded to a WIO and that reporters feel supported.

9. Protection of Whistleblowers

Denison is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that reporters are treated fairly and do not suffer detriment. The protections offered include the following:

9.1 Protection against detriment or unfair treatment

You will be protected under this Policy when you make a disclosure of a Reportable Conduct even if the investigations rule that your concern was not substantiated or if a determination was not possible.

No person may cause detriment to someone else, or threaten detriment, because they believe that the person has or will make a report. Detrimental or unfair treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment.

If you are subjected to detrimental or unfair treatment as a result of making a report under this Policy, you should inform one of the authorised parties listed in section 6. You may also seek independent legal advice or contact regulatory bodies such as ASIC, APRA or the ATO (see Attachment 1).

9.2 Protection of your identity and confidentiality

Denison will look to protect the identity of anyone who reports a concern.

A reporter's identity and their status as a whistleblower (and any information that Denison has as a result of the report which could be used to identify the reporter) will only be disclosed if you consent to that disclosure or where the disclosure is required by law such as when the concern is reported to a regulator.

If Denison needs to investigate a report, it may disclose your identity to legal practitioners (in order to take legal advice) and WIOs who have a need to know. In all instances, Denison will take reasonable steps to reduce this risk including obtaining appropriate undertakings from those parties. All files and documents created from an investigation will be retained securely by the Whistleblower Protection Officer.

Denison wants to assure reporters that it views a release of information in breach of this Policy as a serious matter and will deal with any breaches under Denison's disciplinary procedures.

9.3 Statutory protections

All reports of Reportable Conduct are protected under this Policy. However, only certain kinds of reports are protected by law - see Attachment 1 to this Policy.

9.4 Other Protections Available

Other protections may be available in response to the specific report and the circumstances, including:

- monitoring and managing the behaviour of other employees;
- relocation of personnel to a different office;
- offering a leave of absence or flexible workplace arrangements while a matter is investigated;
- access to counselling or other support services;
- rectifying detriment that has been suffered.

10. Investigation of Reportable Conduct

Denison is committed to ensuring that all matters reported under this Policy are investigated fairly and confidentially and in a timely manner.

The WPO supervises the investigation of whistleblowing reports made in good faith and reports on the status of investigations to the Audit & Risk Committee and the Board.

The ARC Chair supervises the investigation of reports of improprieties in matters of financial reporting and other financial misconduct and reports on the status of investigations to the Audit & Risk Committee and the Board.

All Denison Personnel must cooperate fully with any investigations.

10.1 Purpose of this Investigation

The purpose of the investigation is to gather all relevant information about the allegations raised in the report, including information which may be provided by a person identified in the report. The appropriateness of doing so will be considered especially if it places the reporter or another person in a vulnerable position. Denison may appoint others to assist with the investigation of a report, including external legal advisers and investigators.

10.2 Investigation Process

After receiving a report, an acknowledgement of receipt will be provided as soon as possible and in any event, within 3 business days of receipt, where the reporter's identity and contact details have been provided.

Where a report is submitted anonymously, a WIO, under the supervision of the ARC Chair, will conduct the investigation and its enquiries based on the information provided to it. The investigation may be limited by that circumstance and it may be difficult to offer the same level of practical support or protection if the WIO does not know the identity of the reporter.

Denison will conduct a review as soon as possible after receipt of a report to determine what action is necessary, including whether to investigate. Denison will also assess whether a report qualifies for specific protections and whether a formal, in-depth investigation is required. Investigations will be completed promptly and fairly by a WIO. The WIO will prepare a written report setting out key findings and areas for improvement.

Where a person is being investigated, the details of the report involving them will be communicated to them (to the extent permitted by law) to provide an opportunity for a response.

If it is appropriate to do so, the WPO or WIO will discuss the investigation procedure with you. However, this may not occur if doing so could prejudice the investigation, place another person's well-being at risk, or put a person at risk of harassment or intimidation.

10.3 How long will the investigation take?

The investigation process will vary depending on the nature of the Reportable Conduct and the amount of information provided. Denison will provide regular updates where possible during the key stages of any investigation - the frequency and timeframe may vary depending on the nature of the report.

If there is insufficient information to warrant further investigation, or the initial investigation immediately identifies there is no case to answer, the WIO will notify you at the earliest possible opportunity.

10.4 How will I receive feedback on my investigation?

The WPO will tell you the outcome of the investigation if appropriate and permitted by law to your nominated contact information (if provided). Potential outcomes include:

- Your concern was substantiated, and appropriate action has been taken;
- Your concern was not substantiated, and no further action will be taken unless further evidence becomes available;
- A determination was not possible, and no further action will be taken unless further evidence becomes available; and
- You may be provided with further feedback, subject to the privacy and confidentiality rights of any individual under investigation and any other confidentiality requirements.

10.5 What happens if the concern is substantiated?

Where an investigation substantiates the report, Denison will consider whether changes to internal processes and systems are required to reduce the likelihood of the Reportable Conduct happening again.

Where a person is found to have engaged in misconduct, the matter will be dealt with under Denison's disciplinary procedures. This may result in disciplinary action, including dismissal.

Criminal matters will be reported to the police or other appropriate regulatory authorities and will also notify the Board of the outcome of the investigation.

11. What if I am not satisfied?

If you believe that your report was not dealt with according to this Policy, or are dissatisfied with the investigation outcome, then you may escalate the matter to the ARC Chair, the Chair of the Board or to an external party.

Denison is not obliged to re-open investigations where it finds that the investigation was conducted properly, or if new information is either not available or would not change the findings of the investigation.

12. Reporting procedures

The WPO will report to Denison's Board on the number and type of incident reports under this Policy. These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this Policy.

In addition, serious or material Reportable Conduct will be considered by the WPO for immediate referral to the Chair of the Audit & Risk Committee and to the Chair of the Board.

13. Further information

13.1 Availability

This Policy will be:

- made available on Denison's website at https://denisongas.com.au/corporate-governance/; and
- included in employee induction information packs and training for new starters.

13.2 Training

Denison will provide annual training on this Policy to all Denison Personnel for awareness and specific training:

- to managers on how to effectively deal with reports; and
- to Denison Personnel with specific responsibilities under the policy.

Such training is mandatory as specified by Denison.

13.3 Monitoring and Review of this Policy

The WPO will monitor key indicators to measure the effectiveness of this Policy and its associated processes.

The Audit & Risk Committee will review the effectiveness of this Policy, including key protections and support to reporters, on an annual basis.

The WPO, WIO and CEO report to the Audit & Risk Committee on matters under this Policy and must make themselves available to it.

Any amendments to this Policy must be reviewed by the CEO, the Audit and Risk Committee and approved by the Board or a committee of the Board as per delegated authority.

Any questions about this Policy should be directed to a WPO.

VER*	Approved By	Approval Date
7	Board	10/03/2025

Application: This policy applies to the Denison group companies, including Denison Gas Limited and its subsidiaries Denison Gas (Queensland) Pty Ltd, Denison Renewables Pty Ltd and Denison Petroleum Services Pty Ltd (together referred to as Denison).

ATTACHMENT 1

Referred to in sections 3, 6 and 9.3 of this Policy.

Protections under the *Corporations Act*

With respect to Denison, the *Corporations Act 2001* (Cth) (**Corporations Act**) affords protection to a reporter provided that they:

- are an individual (related to Denison as described in section 2 of this Policy); and
- have reasonable grounds to suspect that the information that they are reporting concerns misconduct or an improper state of affairs relating to Denison (which would include most forms of Reportable Conduct under this Policy); and
- make the disclosure to:
    - ASIC, APRA or another Commonwealth body prescribed by regulation;
    - An officer (including a director or company secretary) or senior executive of any of Denison's entities;
    - an Eligible Recipient as defined in this Policy;
    - an auditor of Denison, or a member of an audit team conducting an audit; or
    - a legal practitioner for legal advice or representation concerning the operation of the statutory protections;
    - an actuary; and
    - a person designated to receive whistleblowing reports under this Policy.

Disclosures relating to a personal work-related grievance may still qualify for protection under this policy if:

- it includes information about misconduct that is accompanied by a personal work-related grievance;
- Denison breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the Reportable Conduct related to information that suggests misconduct beyond the reporter's personal circumstances;
- an individual suffers from or is threatened with detriment for disclosing Reportable Conduct; or
- an individual seeks legal advice or legal representation about the operation of the Whistleblower protections under the Corporations Act;
- the report is made to the General Manager or the staff of the Fair Work Commission, a Fair Work Commission tribunal member or a Fair Work Ombudsman staff member.

The Corporations Act also provides protections for public interest disclosures and emergency disclosures which meet specific requirements prescribed by the Corporations Act. The protections available under the Corporations Act apply to an individual who meets the requirements above include:

- the right to have their identity protected under the provisions of that legislation;
- a need for Denison to take reasonable steps to reduce the risk the individual is identified as part of any process conducted under this Policy;
- the right to be protected from civil, criminal or administrative liability (including disciplinary action) from making the disclosure, from contractual or other remedies based on the disclosure, and from the admissibility of the information provided in evidence against the person in each case under the provisions of that legislation;
- the right to be protected from detrimental treatment or victimisation;
- the right to compensation and other remedies; and
- the right not to be required to disclose their identity before any court or tribunal.

A. Reports relating to tax affairs

The *Tax Administration Act 1953* (Cth) (**Tax Administration Act**) protects disclosures of information that indicates misconduct or an improper state of affairs about the tax affairs of an entity or an associate of an entity. This protection applies where persons consider the information may assist the recipient in performing functions or duties about the tax affairs of the entity or an associate.

The protection is provided for disclosures made to the Commissioner of Taxation, the Tax Practitioners Board, the Inspector-General of Taxation and the Australian Charities and Not-for-profits Commission (ACNC) or any person or agency specified in section 6 of this Policy. The protections available to a person making a protected disclosure under the Tax Administration Act are the same as those outlined above in section A of this Schedule.

B. Other Statutory Protections

Additional statutory protections may also be available, including:

- compensation for loss, damage or injury suffered as a result of Reportable Conduct;
- an injunction to prevent, stop or remedy the effects of the Reportable Conduct;
- an order requiring an apology for engaging in the Reportable Conduct;
- reinstatement of a position if the Reportable Conduct wholly or partly resulted in the termination of an employee's employment; or
- any other order the court thinks appropriate.

The law also states that if you make a protected disclosure:

- in some circumstances (e.g. if the disclosure has been made to a regulator) the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- you are not subject to any civil, criminal or administrative liability for making the disclosure; and
- no contractual or other remedy may be enforced or exercised against on you the basis of the disclosure.