



Working with Integrity Policy



SYRAH RESOURCES

www.syrahresources.com.au

enquiries@syrahresources.com.au

03 9670 7264

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

Syrah Resources Limited is committed to maintaining international performance standards for corporate governance and compliance, through systems and processes which enable employees and contractors (our people) to work with **Integrity & Fairness** at all times.

Syrah Resources Limited will maintain its licence to operate via good governance and compliance by:

- **Defining, communicating, & training our people** in all facets of working with integrity, including but not limited to:
 - The Company Values;
 - The highest standards of honesty, integrity and ethical, responsible and law-abiding behaviour expected of our people, including Company Directors;
 - Code of Conduct and Workplace Behaviour Policy requirements;
 - Anti-corruption and anti-bribery requirements;
 - Human rights protections; o Diversity and inclusion requirements;
 - Whistle-blower provisions; and
 - Employee assistance programmes.
- Supporting our people to conduct business with **integrity & fairness** in compliance with the laws in all jurisdictions where it operates.
- **Maintaining robust, transparent and auditable procurement processes** that promote open competition and treat all suppliers fairly and ethically.
- Implementing programs and initiatives that promote **workplace diversity & inclusion** and equal employment opportunities.
- Ensuring processes exist and are widely communicated to facilitate the **reporting and investigation** of suspected violations of the code of conduct, or unethical and or unlawful behaviour.
- ensuring that there are **no instances of making, offering or promising** to make a payment or transfer anything of value to government personnel and other officials for the purpose of improperly obtaining or retaining business advantage;

- **Providing whistle-blower protection** to ensure employee and stakeholder confidence that any suspected breach of Company policy is reported freely and investigated thoroughly.
- **Providing employee assistance programmes** to ensure the health & wellbeing of our people and contractors is protected.
- **Maintaining books and records** to demonstrate auditable compliance.
- **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 respective Subcommittees** to ensure alignment with the strategic objectives of the Company.

Syrah Resources Limited			
Title	Working with Integrity Policy		
Document No.	SYR-POL- Working with Integrity Policy	Revision	4.0
Document Status		Language	English
Last Review	01 October 2019	Next Review	01 October 2020
Level of Confidentiality			

This Revision	
Author (s)	Jordan Morrissey
Authorised Reviewers	
Authorised Approver	Shaun Verner
Document Control	

Revision History						
Author (s)	Reviewer (s)	Approver	Revision Number	Status	Revision Date	Description