

## SPEAK UP POLICY

### 1 Purpose

The purpose of this Policy is to describe the reporting channels that JTMEC offers for receiving reports with information on misconduct. The channels are designed, established, and operated in a secure manner to ensure that the confidentiality of the identity of the reporting persons and any third parties mentioned in the reports is protected, and to prevent access thereto by non-authorized staff members.

### 2 Responsibility

The JTMEC compliance manager is responsible to:

- translate this policy into local language and communicate it to its organization by publishing the translated policy on the intranet and where JTMEC publishes its policies
- at each location post the template poster in the Epiroc Way, section 06.06 translated into local language (below referred to as "Speak Up Poster")
- on JTMEC's external websites post a translation into local language of the external website text in the Epiroc Way, section 06.06 (below referred to as "External Website Text"). The JTMEC business support team will post translations into local language on the local JTMEC sites as applicable.

The JTMEC business support team is responsible for this Policy and for updating and communicating changes.

### 3. Reporting Information on Misconduct

#### 3.1 What can be reported?

Information, acquired in a work-related context, on misconduct in violation of applicable laws, other irregularities in respect of which there is a public interest, violations of the JTMEC and Epiroc Code of Conduct, Epiroc Business Partner Code of Conduct or Group policies, (below referred to as "Information"), can be reported.

#### 3.2 Who can report?

The following categories of persons (below referred to as "Reporting Persons") can report Information:

- employees, applicants, volunteers, trainees, self-employed persons, persons working under the supervision and control of customers, contractors, sub-contractors, suppliers or other undertakings or bodies, shareholders, persons who are members of administrative, management or supervisory bodies or available for such positions

- persons who have belonged to the above-mentioned categories of reporting persons and acquired the Information during their time in such roles may also report Information
- persons whose work-based relationship is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations.
- persons whose work-based relationship is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations.

### 3.3 Where can reports be submitted?

JTMEC offers Reporting Persons to report Information via the global reporting channel (below referred to as the “Global Speak Up-Line”) where all communication with the Reporting Person will be handled at Group level and the appropriate persons appointed by Group Compliance to follow up on reported Information and provide feedback. An employee who wants to report concerns, which only relate to the employee’s own working or employment conditions shall report the information to the employee’s manager or the manager’s manager. If this is uncomfortable, inappropriate or for other reasons not possible or practical, the employee can contact Human Resources or the Business Support function.

The Global Speak Up-Line and the Local Speak Up-Line are below together referred to as the “Reporting Channels”).

#### 3.3.1 Global Speak Up-Line

If a Reporting Person reports Information via the Global Speak Up-Line Group Compliance will:

- receive the report on the Information
- acknowledge receipt of the report on the Information within seven days
- designate impartial person(s) or department(s) to follow up on the reported Information
- ascertain that information resulting from the follow up is utilized to address the reported breach
- maintain communication with the Reporting Person to follow up and where necessary ask for further information
- within three months provide feedback to the Reporting Person on measures taken in the follow up and the reasons for this

### 3.4 Where to access the Reporting Channels?

See below the websites on which the Global Speak Up-Line and the Local Speak Up-Line can be accessed by:

- Employees and others with Epiroc email addresses: <https://home.intranet.epiroc.com/sites/function/SpeakUp/sitePages/Home.aspx>
- External Reporting Persons: <https://www.speakupfeedback.eu/web/epirocthirdpartyline>
- JTMEC Reporting: [HR@jtmec.com.au](mailto:HR@jtmec.com.au)

## 4 Obligations of Employees

All employees are expected to make themselves available and fully cooperate with the person(s) or department(s) designated to follow up on reported Information.

Employees who, in the capacity of their position, receive reports on misconduct outside the Reporting Channels should contact Group Compliance for recording of the reports of misconduct in the Epiroc's Speak Up system.

## 5 Protection against hindering reporting and retaliation

Epiroc and JTMEC will not:

- hinder Reporting Persons to report Information
- retaliate against a Reporting Person
- retaliate against persons assisting a Reporting Person in the reporting of Information, third persons who relate to such Reporting Persons and who could suffer retaliation in a work-related context (such as colleagues or relatives) or legal entities that the Reporting Persons own, work for or are otherwise connected with in a work-related context.
- prevent or retaliate against a Reporting Person for consulting with the Reporting Person's labor union.

## 6 Protection in the form of discharge of liability

Reporting Persons may not be considered to have breached any restriction on disclosure of information and shall not incur liability of any kind in respect of such report, if the Reporting Person at the time of reporting the Information through the Reporting Channel had reasonable grounds to believe:

- that the reporting of Information was necessary to reveal the reported misconduct
- that the Information was true at the time of the reporting.

Reporting Persons may not share documents, or acquire or access information in a manner, which would constitute a self-standing criminal offence.

## 7 Data Privacy

### 7.1 Purpose of processing of personal data

Personal Data processed in the follow up of reported Information may be processed only if the processing of the personal data is:

- necessary to follow up on Information reported
- necessary to take actions based on the results of the follow up not incompatible with the purpose for which they were collected
- necessary to for the use of reports in judicial proceedings
- conducted in accordance with laws and regulations
- is not incompatible with the purpose for which the personal data was collected

### 7.2 Access to personal data

Only persons appointed to manage reported Information may have access to the personal information processed and only to the extent necessary to fulfil their tasks.

### 7.3 Retention period

Personal data processed to follow up of Information reported may not be processed longer than two years after the matter was closed. Personal Data which is manifestly not relevant for the handling of a specific report of Information will not be collected or if accidentally collected, shall be deleted with undue delay.

## 8 Duty of confidentiality

Persons appointed to follow up on reported Information may not make unauthorized disclosures of information that may reveal the identity of the Reporting Person or third persons in the follow up matter.

## 9 Record keeping of the reports

JTMEC will keep records of every report received and store reports and documentation of oral reports as long as necessary, but no longer than two years from the closure of the case.



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