

Whistleblowing Integrity Reporting Guidelines

The Company does not tolerate fraud, abuse of authority, non-compliance or unethical behavior. *In using the Hotline reporting mechanism, please consider the following guidelines:*

Responsible Reporting

The **Whistleblowing Integrity Reporting** is an additional reporting feature and a secure venue for employees and stakeholders to pro-actively and responsibly raise valid concerns affecting the Company for proper resolution.

Malicious Reporting

The **Whistleblowing Integrity Reporting** is **not** intended for false or malicious complaints. While it is intended to protect the Reporter from any unfair treatment resulting from his/her disclosure, abuse or misuse of the Whistleblowing Integrity mechanism by making petty, false or malicious complaints is not tolerated.

Confidentiality

Reporting of the concern or complaint raised shall be treated with due care and confidentiality. It is essential that the Reporter provide all critical information, details and documentation to enable the Company to effectively evaluate and investigate the matter. In reporting a concern anonymously, there must be adequate information provided for the Company to have an informed judgment as it is difficult to assess the genuineness of an anonymous report without sufficient basis.

Non-Retaliation

The Company strictly prohibits reprisal, intimidation or harassment of any kind against a Reporter who discloses a complaint or concern *in good faith* and based on his/her reasonable belief that a wrongdoing was committed. Those participating in an investigation of a complaint are likewise covered by this policy. The Company shall investigate and address promptly any concern of retaliation and harassment brought to its attention. Any reprisal or victimization will be treated as serious disciplinary matter and as such, the Company shall extend all possible assistance to the Reporter under the law.

Remedies and Sanctions

Any employee or stakeholder who does, causes or encourages retaliatory actions against a Reporter, his/her relatives, and/or any employee supporting the Reporter, shall be subjected to any and all applicable administrative, civil and/or criminal proceedings.

If it is eventually proven that the Reporter made malicious and fabricated falsehoods, and/or he/she persists in making them, appropriate legal action may be taken against him/her by the Company.

Whistleblowing Integrity Form (Annex A)

The Whistleblowing Integrity Form is downloadable at the Corporate Governance section of the Company's website: www.semiraramining.com, and upon its completion may be emailed to **integrity@semirarampc.com**.

Strictly Confidential

Annex A

WHISTLEBLOWING INTEGRITY FORM

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Report Ref. No./Date

YOUR CONTACT INFORMATION **Required field*

NAME (In Print – First, Middle, Last)	COMPANY
HOME ADDRESS	OFFICE ADDRESS
EMAIL ADDRESS	POSITION
MOBILE NO./HOME NO.	OFFICE NO.
RELATIONSHIP TO THE COMPANY * <input type="checkbox"/> Employee <input type="checkbox"/> Supplier <input type="checkbox"/> Customer <input type="checkbox"/> Other, pls. specify	

ISSUE, COMPLAINT or INCIDENT **Required fields*

DESCRIPTION * (Please attach additional sheet & supporting documents if necessary) _____ _____ _____ _____	
PERSON(S) INVOLVED – NAME*, POSITION*, COMPANY* _____ _____ _____	
DATE(S)/TIME OF OCCURRENCE *	PLACE(S) OF OCCURRENCE *
APPROX. AMOUNT INVOLVED?	FREQUENCY OF OCCURRENCE
YOUR INVOLVEMENT on the issue being reported * <input type="checkbox"/> Personal or direct knowledge <input type="checkbox"/> Others, pls specify _____	

Whistleblowing Integrity Administration

(Supplement to Fraud & Ethics Response Policy)

- a. Upon receipt of a concern or complaint, the Company makes an assessment thereof, and directs the concern or complaint to the department/authority best placed to address it (while maintaining oversight authority for the investigation), or lead the investigation in person to ensure prompt and appropriate investigation and resolution.
- b. The action taken by the Company will depend on the nature of the concern. The matters raised may:
- be investigated internally
 - be referred to law enforcement officers

c. REPORTABLE CONCERNS

REPORT CATEGORY	DESCRIPTION	EXAMPLES
Misconduct or Policy Violation	Acts that violate moral or civil law, Code of Conduct, company policies or contractual agreements.	<ul style="list-style-type: none"> • Violation of Code of Conduct or good governance policies • Unauthorized Control Overrides • Abuse of authority
Theft, Fraud or Misappropriation	Fraudulent appropriation of funds or property entrusted to one's care but owned by the Co. or another person.	<ul style="list-style-type: none"> • Stealing • False representation • Misappropriation of funds
Conflict of Interest	Situations which may impair the objectivity of a person due to self-interest vs. Company or public interest.	<ul style="list-style-type: none"> • Inappropriate relations • Questionable transactions with clients, suppliers, business partners; • Misuse of client/company or resources for personal gain or interests
Financial Reporting concerns	Deliberate misstatements in recording, reporting or non-reporting transactions or results of operations.	<ul style="list-style-type: none"> • Misstatements in financial reports • Deliberate incorrect accounting • Irregularities in application of accounting standards