

STL Whistle blowing Policy



Société Congolaise pour le traitement
du Terril de Lubumbashi

TUWE MFANO
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STL Whistle blowing Policy

1. Purpose

This policy establishes STL's commitment to providing a safe and transparent mechanism for employees and stakeholders to report suspected misconduct, illegal, unethical, or unsafe practices, without fear of retaliation. It supports STL's values of integrity, accountability, safety, and respect for people and the environment.

2. Scope

This policy applies to all STL employees, contractors, suppliers, and other stakeholders acting on behalf of STL.

3. Policy statement

STL strictly prohibits retaliation against any individual who, in good faith, reports concerns or suspected wrongdoing. Whistleblowers are protected against adverse employment actions, including dismissal, demotion, loss of benefits, intimidation, harassment, or threats. Confidentiality will be fully maintained possible during investigations, subject to legal obligations and the rights of individuals accused. Protection under this policy does not exempt employees from accountability for their own misconduct.

4. What can be reported

Concerns may include, but are not limited to:

- Fraud, theft, or corruption;
- Violations of laws, regulations, or STL policies;
- Health, safety, or environmental breaches;
- Human rights abuses or unethical conduct;
- Conflicts of interest or abuse of authority;
- Substantial mismanagement or waste of company resources.

5. Reporting channels

Primary: Immediate supervisor or line manager.

Alternate:

- Human Resources Department (HR);
- Suggestion boxes located in three designated areas across the STL site (checked bi-weekly).

Escalation: Reports can also be submitted directly to the General Manager (GM) or Deputy General Manager (Deputy GM) where appropriate.

Reports may be made verbally, in writing, or anonymously where practical.

6. Investigation Process

All reports will be reviewed by the HR Manager, the RMI Responsible Manager, and either the General Manager or Deputy General Manager. Investigations will be fair, impartial, and confidential. The whistleblower will be informed of the progress and outcome of the investigation if their identity and contact details are known. False or malicious reports made knowingly will result in disciplinary action.

7. Disciplinary Actions

Confirmed misconduct may lead to disciplinary measures determined by HR, ranging from warnings, mandatory retraining, suspension, reassignment, to termination of employment. For contractors or suppliers, corrective measures may include warnings, contract review, or termination of contracts.

8. Non-Relation Guarantee

Any employee who believes they are experiencing retaliation for whistleblowing may report this concern directly to HR, the RMI Responsible Manager, or the General Manager — whichever channel they feel most comfortable with. STL guarantees corrective measures will be taken.

9. Responsibilities

Employees/Contractors: Report suspected wrongdoing in good faith.

Supervisors/Managers: Forward whistleblowing reports immediately to HR, the RMI Responsible Manager, and the GM, while maintaining strict discretion. Disclosure of such information to non-concerned parties is prohibited and will be treated as misconduct.

HR Manager: Lead investigations, ensure protection of whistleblowers,

recommend disciplinary measures.

RMI Responsible Manager: Ensure alignment with STL's responsible sourcing and due diligence standards.

General Manager / Deputy GM: Provide oversight, ensure accountability and impartiality in investigations.

10. Review and Continuous Improvement

This policy will be reviewed periodically to ensure alignment with best practices, applicable laws, and STL's SHEC commitments.