

Whistle-blower Protection Policy

1. Scope

Greenland Minerals Limited (“**the Company**”) is committed to maintaining a high standard of integrity and ethical business practices at all times. This Whistle-blower Protection Policy (“**Policy**”) applies to all directors, employees, contractors and consultants (together “**Staff**”) of the Company and its related entities.

2. Objective

The purpose of the Policy is to supplement the Company’s Code of Conduct and Risk Management Policies. The aim of the Policy is to encourage Staff to report and behaviour they suspect to be in breach of the Company’s Code of Conduct, any other Company policies or unethical or illegal behaviour, (“**Reportable Matters**”). Company Staff have a responsibility to assist with the detection and reporting of instances of Reportable Matters. Staff are encouraged to immediately report any suspicions or knowledge of any wrongdoing or malpractice.

The Policy is intended to provide Staff with the confidence that any report made will be investigated objectively and independently and they will be protected from any reprisals or disadvantage in any form.

3. Reportable Matters

A Reportable Matter is any concern, regardless if based on actual knowledge or suspicion of malpractice or wrongdoing, including:

- A breach of the Company’s Code of Conduct or any other Company code or policy;
- A breach of any applicable law, regulation or other illegal activity;
- Conduct that constitutes bribery, corruption or abuse of authority;
- Fraud, theft or misappropriation of Company assets or property;
- Misrepresentation or false statement relating to the Company, by directors, officers or employees;
- Bullying, harassment or other inappropriate behavior;
- Any other act that may result in damage to the Company, shareholders, suppliers or any other stakeholder.

4. Making a Report

A person making a report under this Policy is referred to as a Whistle-blower and all information provided by them will be treated as confidential. The manner in which a report is made may vary depending on the specific subject matter of the Whistle-blower’s concerns, and who within the Company the concerns relate to. The Policy aims to provide a Whistle-blower with a number of options for making a report.

Who should a report be made to?

A Whistle-blower can make a report under this Policy to an Investigations Office, which can be any of the following:

- Their immediate supervisor
- The Company Secretary
- Chairman of the Audit Committee
- The Company Chairman

How can a report be made?

A Whistle-blower can make a report under this policy:

- In person
- By email to the email address of any of the Investigations Officer
- In writing addressed to:

Greenland Minerals Limited
PO Box 2006
Subiaco WA 6904

The report should be marked PRIVATE and CONFIDENTIAL and attention to the Investigations Officer you wish to make the report to.

Report in writing can be anonymous, however, this may affect the ability to properly investigate the report.

Nothing in this Policy should be taken as restricting a Whistle-blower from reporting their concerns directly to the Australian Securities and Investment Commissions (ASIC), the Australian Securities Exchange (ASX) or any other regulatory body.

5. Investigation of a report

The investigation process and whether the investigation is dealt with internally or externally, will depend on the nature of the matter being investigated. The Company's objective is that all reports are investigated in a manner that is fair and objective to those involved.

Except where a report is made anonymously, as part of the investigation the Whistle-blower will be interviewed privately and may be asked to sign a written statement. The Whistle-blower's identity will be kept confidential at all times and will only be disclosed with the Whistle-blower's consent and if it is essential to the investigation.

Where possible, the Whistle-blower will be kept informed of the progress of the investigation and its outcomes including the course of action the Company proposes to take. If following the investigation, it is decided that no action will be taken, an appropriate explanation of this decision will be provided to the Whistle-blower.

At the conclusion of the investigation, a detailed report will be provided to the Managing Director, or if appropriate, to the Board. All reports, records and other material relating to the investigation will be securely and confidentially maintained.

6. Whistle-blower Protection

The Identity, of a Whistle-blower will be kept confidential at all times and will only be disclosed with the Whistle-blower's consent and only where the disclosure is critical to any investigation. The Whistle-blower should be aware that it may be possible for someone to deduce their identity during any investigatory process, all care will be taken to where possible reduce this risk.

The Company will safeguard the interests of the Whistle-blower at all times, having regard to this Policy, the Australian Whistle-blower Protection Programs and any other applicable policies and laws. The Company will take whatever action possible to ensure that a Whistle-blower is not personally disadvantaged for making a report, whether by dismissal, demotion, or any form of harassment or discrimination.

Should a Whistle-blower feel they have in any way been disadvantaged, they should report their concerns immediately to either the Company Chairman or the Chairman of the Audit Committee. The Company will consider any actions by a Staff member that are aimed at disadvantaging a Whistle-blower, as a result of the report made, to be a serious breach of this Policy.

7. Review of this Policy

This Policy will be reviewed regularly by the Company's directors in consideration of changing Company circumstances, legal requirements and Listing Rules. Any changes to this policy will be notified to affected persons in writing. If Staff have any comments or views concerning the operation or effectiveness of this Policy, they should be communicated to the Company Secretary.

8. Policy Compliance

Strict compliance with this policy is mandatory for all persons covered under this policy and breaches of this policy may damage the Company's reputation. Accordingly, breaches will be taken very seriously by the Company and will be subject to disciplinary action, including possible termination of a person's employment or appointment.

9. Question?

If you have any questions regarding this Policy, you should contact the Company Secretary.