

Communication Policy

Version 04 (April 2024)



The Whitehaven Coal [Code of Conduct](#) outlines the standard of behaviour expected of everyone working for, or on behalf of, Whitehaven Coal (Whitehaven) and aims to promote a safe, healthy and productive workplace.

This Communication Policy outlines appropriate conduct for the Whitehaven workforce on company communication, including commenting in the media, on social media and other public forums, consistent with the Code of Conduct.

Careful coordination of communication is required to support timely and accurate dissemination of information and to minimise the risk of sharing inaccurate or inappropriate information, which can ultimately impact Whitehaven's reputation, credibility or profitability.

As Whitehaven Coal Limited is listed on the Australian Securities Exchange, the company is bound by stringent reporting and disclosure requirements in relation to material information. Penalties in relation to breaches of these requirements are significant. Our [Continuous Disclosure Policy](#) deals with the release of market sensitive information.

Brand and logo use

To ensure consistency in how Whitehaven's brand is represented, please refer to the Brand Guidelines. Contact the Corporate, Government & Community Affairs (CG&CA) team for the guidelines and approval to use the Whitehaven logo. See contact details at the end of this Policy.

Unauthorised use of company logos, images and copyrighted material is prohibited.

External communication

The CG&CA is responsible for external Company communication. Contact the CG&CA team for approval to share or update content on Company-owned external channels such as whitehavencoal.com.au, social media, etc. and for support and approval for promotional activities (advertising, etc.)

Company-wide internal communications

All company-wide internal communications must be approved by a 'sponsoring' EGM (i.e., the EGM with functional accountability for the subject matter) **and** the CG&CA team.

Public comments by Whitehaven personnel

Public commentary by the Whitehaven workforce can have the potential to impact Whitehaven's reputation, credibility or profitability. Whitehaven Coal's Code of Conduct applies both online and offline – such as when posting and commenting on social media or speaking at an event.

Speaking engagements

Whitehaven personnel that are asked to represent the business in any public forum, such as a speaking engagement or community event, should contact the CG&CA team before accepting.

This will ensure the event is properly vetted and the purpose, audience and risks are well understood.

After examining the event, the CG&CA team will identify an appropriate representative and ensure they are thoroughly prepared before representing the company.

On-site filming or photography activities

Prior to any on-site media activities being conducted, such as filming or photography, Whitehaven personnel must provide the CG&CA team with an overview of the proposal for approval. This includes activities for internal use.

It is the responsibility of the employee organising the activity to ensure all appropriate measures are taken on-site, including access clearance, transport and PPE requirements.

Interacting with journalists

To ensure consistency of messaging, the Managing Director and CEO is the only public spokesperson for the company on corporate or industry issues in a media context. From time to time, other personnel may be authorised by the Managing Director and CEO to speak to media in relation to specific issues.

Should you be contacted by a journalist, please:

- State that you are not authorised to speak on behalf of the company.
- Politely request their name, organisation and contact details (direct phone number and/or email).
- If possible, take a brief description of the issue they are inquiring about, and their deadline.
- Inform them that we would like to help and that our media representative will call them back to provide a comment or arrange an interview, if possible, with the appropriate spokesperson.
- Immediately pass the details on to Executive General Manager Corporate, Government and Community Affairs or Senior Manager – Group Communications, using the contact details below.

Michael van Maanen
0412 500 351
mvanmaanen@whitehavencoal.com.au

Sam Deans
0449 988 209
sdeans@whitehavencoal.com.au

If you have been authorised to speak to or work with a particular media outlet, please inform the EGM Corporate, Government and Community Affairs or the Senior Manager, Group Communications of all contact and activity with that organisation. This includes advertisements, advertorials, general articles and contact from local newspapers, radio, websites and television.

Media site visits must be approved by site managers and the EGM of Corporate, Government and Community Affairs. Media representatives must be accompanied by authorised personnel and adhere to site safety procedures at all times while on site.

Inappropriate public comments

Unacceptable and inappropriate behaviour will not be tolerated, regardless of whether it is undertaken in a professional or personal capacity – noting that an employee's comments and actions can reflect on the company itself.

Unacceptable and inappropriate behaviour and commentary in any public forum, online or offline, includes, but is not limited to, the following:

1. Breach of laws or regulations;
2. Abuse, harassment, bullying, discrimination, vilification or victimisation;
3. Threatening or intimidating behaviour towards others;
4. Making unauthorised public statements about Whitehaven or its position in respect of any matter, or other activities that adversely affect Whitehaven or its reputation;

5. Directly or indirectly engaging in any activity which could by association cause Whitehaven public embarrassment or bring Whitehaven into disrepute;
6. Inappropriate use of Whitehaven assets;
7. Distributing images of any of the following type:
 - Private, confidential or copyrighted documents or other material;
 - Whitehaven property or facilities that are not accessible to the general public;
 - Any person, object, act or incident where the image would be considered inappropriate or offensive; and
 - Transmitting any information of a threatening, obscene, pornographic, discriminatory or harassing nature.
8. Unauthorised sharing of sensitive or confidential information (electronic or hard copies) relating to Whitehaven or its operations;
9. Unauthorised use of Whitehaven's name or logo; and
10. Failure to comply with any other Whitehaven policy or procedure.

In addition to the above, please refer to the *Use of social media* section below.

Use of social media

Whitehaven employees are reminded that if they are using social media in a personal capacity, you must ensure your actions are consistent with your obligations as an employee of Whitehaven. In many cases, comments and posts made via social media platforms are as public as if the same comments were made to the media or at a public forum.

Definitions

"Social media" is defined as any platform for online publication and commentary, including but not limited to:

- Social and professional networking sites (e.g. Facebook, LinkedIn).
- Video, audio and photo sharing websites (e.g. YouTube, TikTok).
- Blogging and micro-blogging sites (e.g. Twitter, WordPress).
- Discussion boards and forums (e.g. Google Groups, Reddit).
- Online encyclopedias (e.g. Wikipedia).

"Posts" include but are not limited to status updates, tweets and comments on any internet forum or any other form of comment published on the internet.

Personal use of social media

Employees who use social media for personal, private purposes should be fully aware of the expectations surrounding use of social media. There is almost inevitably a permanent record of the content published on social media.

Employees are responsible for any material they publish in a personal capacity on any form of social media platform.

Where employees are using social media in a personal capacity, you must:

- When expressing personal views, ensure the account is identified as a personal/private account so no inference can be drawn that the views published are those of Whitehaven.
- Respect the privacy of other Whitehaven employees.
- When interacting with others, ensure you do so respectfully.
- During any social media communication, avoid the risk of creating any reputational damage to Whitehaven.
- You must not:

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- Represent that you are using social media for or on behalf of Whitehaven.
- Imply in any way that you are authorised to communicate on Whitehaven's behalf.
- Use social media in a way that may embarrass or disparage Whitehaven.
- Breach confidentiality, intellectual property or continuous disclosure obligations regarding information relating to Whitehaven.
- Publish material that would bring Whitehaven into disrepute or impact adversely upon Whitehaven's interests.
- Communicate on Whitehaven matters where not explicitly authorised to do so.
- Provide comment on any information in relation to Whitehaven that is not in the public domain.

Reporting inappropriate public comments

If you see any public comments by Whitehaven personnel that contravene this policy and / or the Code of Conduct, you should in the first instance discuss this with your line manager. Line managers should advise Whitehaven's People & Culture team at P&CSupport@whitehavencoal.com.au and the Corporate, Government and Community Affairs team of any such incident.

Consequences for breaching the Communication policy

Depending on the circumstances of the breach, an employee who is found to have breached this policy may be subject to disciplinary action, including counselling, a warning, removal of access to electronic communication, dismissal with notice, or summary dismissal.

CG&CA Team Contacts

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sdeans@whitehavencoal.com.au

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