

Whistleblower

The Whistleblower policy is aligned to our Company values. It is one of a number of policies the Company has in place to support ethical and honest behaviour, and to effectively manage and mitigate potential risk and cultural issues.

The policy supports and provides a safe and confidential environment for employees, including contractors, consultants, volunteers and former employees as well as their spouses, dependants, and other relatives, and anonymous disclosures to report wrongdoing, without fear of victimisation, reprisal, dismissal or discriminatory treatment.

What is “Wrongdoing”?

The Company is committed to maintaining ethical and honest behaviour in the workplace. If an employee genuinely believes in good faith and on reasonable grounds that wrongdoing has occurred, they are encouraged to report this. In reporting wrongdoing, employees should not be disadvantaged or victimised. The Company will endeavour to protect all employees making genuine reports of wrongdoing.

Wrongdoing can include but is not limited to:

- Dishonest, unethical, fraudulent or corrupt behaviour;
- Accepting or offering bribes, payments or other benefits;
- Committing fraudulent activities;
- Conduct causing damage to the reputation of the Company;
- Breach of any legislation or regulation (including theft, drug sale and/or use and violence);
- Breach of internal policies;
- Inappropriate behaviour relating to accounting and audit matters;
- Concealment of wrongdoing;

- **Unsafe work practices and/or behaviour that creates risk to health and safety;**
- **Any other conduct, deliberate or otherwise, that may cause material financial or non-financial loss to the Company.**

Reporting

Employees are encouraged to report any wrongdoing that is in breach of the Whistleblower Policy or other Company policies, including the Company values. Where a report has been made in good faith, the Company will endeavour to protect the employee making the report and prevent or act upon victimisation that may occur as a result. Should retaliation occur, the Company will treat this as serious wrongdoing under this policy and under the Anti-Bullying and Anti-Harassment policy.

Reports of wrongdoing can be made to the relevant internal officer as defined below:

- **Wrongdoing concerning a fellow employee/s: A Manager or the Business Owner**
- **Wrongdoing concerning a member of the Leadership team: The Business Owner**

If an employee does not feel comfortable reporting the manner internally, they can contact HR Central.

Reports of wrongdoing should be in writing and where possible include, as appropriate, the following:

- **The alleged breach;**
- **The person/persons alleged to be responsible for the breach;**
- **Facts which have led the employee to believe a breach has occurred;**
- **Further evidence that would support/substantiate the claim.**

Anonymous Reports

Anonymous reports will be accepted under this policy and can be made to the Business Owner or HR Central. However, the Company cannot guarantee anonymity in all cases. Anonymous reports will be handled consistent with the law and reporting requirements, and the identity of the individual making the claim will be kept confidential to the extent practicable permitted by law. Anonymous reports have limitations that may inhibit finding a resolution. Proper and appropriate investigations cannot occur due to an inability to gather additional information and this impacts the Company's ability to report back on progress and the outcome.

This policy does not replace the reporting procedures within it for resolving grievances regarding discriminatory, harassing or bullying behaviour.

Any wrongdoing reported may be investigated using the investigation procedure outlined below. Any employee that reports wrongdoing must maintain confidentiality at all times.

What types of disclosures are protected?

- **Misconduct or an "improper state of affairs or circumstances" regarding any of the entities covered by the laws or their related bodies corporate.**
- **Conduct that breaches the Corporations Act 2001 or conduct that breaches the ASIC Act or a range of specified insurance, life insurance and superannuation statutes.**
- **Conduct that relates to an offence against any law of the Commonwealth which is punishable by imprisonment for 12 months or more, or**
- **A danger to the public or the financial system.**

It is important to note that these protections do not extend to 'personal work-related grievances', (that is grievances by an employee relating to their employment or former employment which impacted them personally).

Investigating Procedures

Upon receiving a report of a breach, the Company will assess whether the claim is genuine, factual and unquestionably credible. If the claim is deemed to be in breach of this policy, the Company will nominate an internal officer, or an external consultant to investigate.

All matters raised will be treated in a confidential, secure and sensitive manner and investigations will be conducted in accordance with the principles of procedural fairness and natural justice.

The principles of natural justice/procedural fairness include:

- ensuring the objectivity of the investigator;
- following a fair and proper procedure;
- acting on the basis of logical proof and evidence when making a decision;
- informing an individual of claims made against them;
- allowing them an opportunity to be heard and respond.

The process for investigation involves the following:

1. Defining the key issues to be investigated;
2. Defining the scope of the investigation including relevant questions to be asked, ensuring the scale of the investigation is proportionate to the seriousness of the allegation and ensuring sufficient and appropriate resourcing;
3. Analysing initial information and evidence relating to the claim;
4. Interviewing any individuals named to be in breach of the policy;
5. Interviewing relevant witnesses
6. Obtaining and examining further evidence;
7. Making a final determination as to whether the breach can be substantiated based upon findings of fact and evidence;

- 8. Developing a report outlining the allegations, relevant findings, the conclusion reached and recommendations to address the wrongdoing.**

Interviews conducted during the investigation may be, with authorisation, taped and notes recorded. Employees reporting wrongdoing will be required to assist in the investigation process by providing any information necessary to assess the claims.

Breach

Any employee found to have engaged in wrongdoing or making a vexatious complaint may be subject to disciplinary action, up to and including termination of employment.

