

## WHISTLEBLOWER PROTECTION POLICY

### Purpose

To document our commitment to section 1317A1 of the Corporations Act 2001 (Cth).

#### **PROCEDURES - THE REPORTING OFFICER MUST TARGET THAT:**

- 1 The provisions of the Whistleblower Protection Policy are reviewed regularly, and in any event at least every two (2) years.
- 2 All applicable employees complete Whistleblower Protection training.

### Overview and Purpose

The purpose of the Whistleblower Protection Policy Rule (referred to in this section as “This Document”) is to detail the procedures which we follow to meet the requirements under the section 1317A1 of the Corporations Act 2001 (Cth).

We are committed to upholding the highest standards of integrity, fairness and ethical conduct and recognises that a whistleblower protection program is an important element in detecting corrupt, illegal, or other undesirable conduct.

We have in place complementary to this Policy Rule, a Whistleblower Protection Policy (the “Policy”), which was developed to target employees can raise concerns regarding any misconduct or improper state of affair or circumstances without being subject to victimisation, harassment, or discriminatory treatment.

Our Board and senior management encourage reporting potential misconduct. A failure to report potential misconduct exposes us to risks and undermines our values.

The objective of this Policy Rule and the Policy is to:

- Encourage our employees to disclose relevant information if they become aware of potential misconduct;
- Detail the procedure in reporting concerns and the protections available to disclosers;
- Outline our processes for responding to disclosures; and
- Target disclosers feel safe in disclosing their concerns.

#### **OVERVIEW OF THE CORPORATION ACT AND REGULATORY GUIDE 270 REQUIREMENTS:**

- We maintain a whistleblower policy that is:
  - aligned to the nature, size, scale and complexity of the business
  - is supported by processes and procedures for effectively dealing with disclosures received under the policy; and
  - uses a positive tone and language that encourages the disclosure of wrongdoing.
- We will take steps to give effect to This Document and Policy by ensuring that it is implemented appropriately and consistently carried out in practice.
- We will have arrangements in place for periodically reviewing and updating This Document and Policy to target issues are identified and rectified.

## **Structure, Operations and Supply Chains**

We are committed to a supportive environment and encourages employees to raise concerns that they may have regarding conduct occurring throughout our operations.

We have several formal and informal ways in which concerns can be raised depending on the circumstances and the level of seriousness of the issue. This is set out in detail in the Policy.

Disclosure made under the Policy will be received and treated sensitively and seriously and will be dealt with fairly and objectively. Our response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

Recipients will keep in contact with disclosers until the matter is resolved by us. If appropriate, disclosers will be told how we have decided to respond to their disclosure, including whether an investigation will be conducted.

## **Board Monitoring and Approval**

We will target that the requirements detailed above in *Overview of Corporations Act and Regulatory Guide 270 Requirements* are fulfilled. Additionally, we will provide its Board an assessment on the implementation of the obligations of This Documents as well as the Policy at least every two (2) years. The Board shall consider the effectiveness of the measures described above and amend the statement as it sees fit.