

Whistleblower Procedure

1. Responsibilities

- 1.1 **The Whistleblower Program Team (“WPT”)**, comprised of the Chairman of the Board and Chief Executive Officer, is responsible for:
- a) Assisting the Whistleblower Protection Officer (“WPO”) in the assessment and oversight of whistleblower reports;
 - b) Providing advice and support to reporters;
 - c) Maintaining a secure and restricted record of all reports made under this Policy and Procedure;
 - d) Arranging role-specific training as and when required.
- 1.2 **WPO** is responsible for ensuring that:
- a) **Workers** are made aware of their rights and responsibilities in relation to whistleblowing at induction; and
 - b) **Workers** are regularly encouraged to speak up about concerns of Reportable Conduct.
- 1.3 **WPO** is responsible for:
- a) Receiving whistleblower reports and protecting the interests of reporters;
 - b) Determining whether the report falls within the scope of the Policy;
 - c) Determining whether and how a report should be investigated;
 - d) Ensuring investigations are conducted in accordance with this Policy;
 - e) Ensuring any reports involving the Chief Executive Officer or a Director are reported to the Chairman of the Board;
 - f) Ensuring any reports involving the Chairman are reported to the Deputy Chairman;
 - g) Updating reporters on progress and details of outcomes to the fullest extent possible;
 - h) Maintaining to the fullest extent possible confidentiality of the identity of and reports received by reporters;
 - i) Immediately reporting concerns in relation to any detrimental conduct to the Chief Executive Officer or Chairman of the Board (provided that the concerns do not relate to them);
 - j) Determining the appropriate courses of action to remediate or act on the investigation;
 - k) Reporting matters to relevant authorities;
 - l) Making recommendations to prevent future instances of reportable misconduct;
 - m) Completing any training mandated by the **WPT**;

- n) Seeking to ensure the integrity of the Whistleblower Program is maintained.
- 1.4 **Workers** are responsible for reporting misconduct or dishonest or illegal activity that has occurred or is suspected within the **Foundation** as quickly as possible, whether anonymously or otherwise.
- 1.5 If any complaint concerns the WPO it should be directed to the CEO or Chairman.

2. Procedure

2.1 How do I make a report?

- 2.1.1 Whistleblowing protections will only apply to reports of Reportable Conduct made in accordance with this Policy and Procedure.
- 2.1.2 Where you have reasonable grounds to suspect that an individual has engaged in Reportable Conduct, you should report the matter to any person authorised by the **Foundation** to receive Whistleblower disclosures. Authorised people are:
 - a) Finance and Investment Manager; (the WPO)
 - b) Chief Executive Officer;
 - c) Board Director; or
 - d) Chairman of the Board.
- 2.1.3 If you are not comfortable or able to report Reportable Conduct internally, you may report it to ASIC.

2.2 How are reports investigated?

- 2.2.1 After receiving your report the **Foundation** will:
 - a) assess the report of Reportable Conduct;
 - b) consider whether there are any conflicts of interest prior to investigating;
 - c) determine whether external authorities need to be notified;
 - d) determine whether and how to investigate; and
 - e) appoint a Whistleblowing Investigator if appropriate.
- 2.2.2 If an investigation is deemed necessary, it will be conducted fairly, objectively and in a timely manner. The investigation process will vary depending on the nature of the Reportable Conduct and the amount of information provided.
- 2.2.3 Any individuals who are accused of misconduct in a report (a Respondent) will have an opportunity to respond to allegations before any adverse findings are made and before any disciplinary action (if appropriate) is taken.
- 2.2.4 The **Foundation** may need to speak with a Whistleblower as part of an investigation. If the identity of the Whistleblower is known, the **Foundation** will endeavour to keep them informed about the status of an investigation.
- 2.2.5 If there is insufficient information to warrant further investigation, or the initial investigation immediately identifies there is no case to answer, the individual who reported the Reportable Conduct will be notified at the earliest possible opportunity.

2.3 Outcome of an investigation

- 2.3.1 At the conclusion of the investigation, a report will be prepared outlining:

- a) a finding of all relevant facts;
- b) a determination as to whether the allegation(s) have been substantiated or otherwise;
- c) the action that will be taken, which may include disciplinary action and dismissal.

2.3.2 The disciplinary action will be dependent on the severity, nature and circumstances of the Reportable Conduct.

2.3.3 Where possible and appropriate, having regard to the **Foundation's** privacy and confidentiality obligations, the Whistleblower will be informed of the outcome of any investigation into their concerns.

3. Related Documents

3.1 Whistleblowing Policy

4. Legislation & Industrial Instruments

- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)
- Fair Work Regulations 2009 (Cth)
- Insurance Act 1973
- Life Insurance Act 1995
- Public Interest Disclosure Act 2013
- Superannuation Industry (Supervision) Act 1993
- Taxation Administration Act 1953

This policy & procedure is not intended to override any industrial instrument, contract, award or legislation.