Whistleblower Procedures

1. Purpose

The Corporations Act 2001 (Cth) protects people who disclose reportable conduct. This policy ensures that staff (employee) and other disclosers can raise concerns about any misconduct or improper circumstance at the Institution (employer), including related entities, without facing victimisation, harassment, or discrimination

2. Scope

The protections in this policy apply to anyone who is or has been an employee, director, officer, contractor (including their employees), supplier (including their employees), associate, consultant, or a relative, dependant, spouse, or dependant of a spouse of any of these people. The protections also apply to anyone who has disclosed information to a legal practitioner for legal advice or representation related to whistleblowing laws.

Personal work-related grievances, like conflicts with other employees or decisions about employment terms, are not within scope of this policy. Instead, grievances of this nature are handled in accordance with the staff grievance procedures in the Employee Handbook, except if a grievance is related to negative treatment because of a disclosure made under this policy.

3. Definitions

See *Glossary of Terms* for definitions for:

- Reportable conduct
- Disclosers
- Eligible recipients
- Whistleblower

4. Procedures

4.1 The employer relies on its employees and other disclosers to maintain its culture of honest and ethical behaviour. Any discloser who becomes aware of reportable conduct are required to make a formal report.

How to report

4.2 Employees of the employer should initially report the reportable conduct to their line manager verbally or in writing. If a discloser is unable to use this reporting channel, a report may be made to an eligible recipient within the employer.

4.3 Reports to an eligible recipient may be made in person or by telephone, and the discloser must inform the eligible recipient that they wish to make a report under this policy.

4.4 Employees should first report any reportable conduct to their line manager, either verbally or in writing. If they are unable to report using this channel, disclosers may report to an eligible recipient within the employer. Eligible recipients include directors, officers, senior managers, or any appointed external auditor.

4.5 Reports to an eligible recipient can be made in person or by phone, and the discloser must inform the recipient that they are making a report under this policy.

Investigation of reportable conduct

4.6 Upon receipt of a report, the relevant line manager or eligible recipient determines if the report relates to reportable conduct and, if so, the report will be investigated as appropriate. The investigation may be conducted internally or via an externally appointed investigator.

4.7 The investigation process and is determined by the nature and substance of the report. All investigations are conducted by the People and Training team in an objective and fair manner and are reasonable and appropriate having regard to the nature of the reportable conduct and the circumstances.

4.8 When a report is received, the line manager or eligible recipient determines if it relates to reportable conduct. If so, an investigation is conducted either internally or by an external investigator.

4.9 The particular investigation process is determined based on the nature and substance of the report. All investigations are conducted by the People and Training team in a fair and objective manner, appropriate to the circumstances.

4.10 If the discloser wishes to remain anonymous, their identity is not disclosed to the investigator or any other person. Information that is likely to lead to the identification of the discloser can only be shared without their consent if it is necessary for the investigation and all reasonable steps are taken to minimise the risk of identification.

4.11 The eligible recipient or investigator provides feedback to the discloser regarding the investigation's progress and outcome, subject to privacy and confidentiality considerations.

Confidential reporting

4.12 All reasonable steps are taken to protect a discloser's identity after reporting any matter considered reportable conduct. Information about the discloser's identity may be disclosed in the following circumstances:

- to Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), or the Australian Federal Police
- to a legal practitioner for legal advice related to whistleblowing protection laws
- With the discloser's consent

4.13 All information, files, and records from an investigation into reportable conduct will be kept securely.

Protections and support for disclosers

4.14 A discloser will not face any civil, criminal, or disciplinary action for making a report under this policy or for participating in any subsequent investigation. The employer does not tolerate any retaliation against a discloser. Retaliation includes any detrimental treatment such as dismissal, injury, alteration of position or duties, discrimination, harassment, intimidation, damage to property, reputation, business, or financial position.

4.15 Detrimental treatment by any employee is a serious breach of this policy and may result in disciplinary action, including termination of employment. Retaliatory conduct may also attract civil or criminal liability.

4.16 The employer connects the discloser with internal and external support providers as necessary.

5. Roles and responsibilities

5.1 The Vice President (People and Training) Vice President (People and Training) is the responsible office of these procedures and oversees their implementation including:

- determining if the report relates to reportable conduct;
- investigating reports of reportable conduct promptly, objective and fair manner;
- providing support to disclosers, ensuring their confidentiality and protection from retaliation; and
- ensuring that the discloser is informed about the progress and outcome of the investigation, subject to privacy and confidentiality considerations.

5.2 Line managers and eligible recipients are responsible for receiving initial reports of reportable conduct from employees and escalating to the Vice President (People and Training).

5.3 The Executive Management Group is responsible for monitoring the implementation of the procedures and approving changes as necessary.

6. Related documents

Employee Handbook

Approved by EMG on 20 February 2025