

In this document and within Fredon, 'Speak Up' references refer to 'Whistleblowing'.

POLICY

1. Why do we have a Speak Up Policy?

At Fredon we value ethical behaviour and high standards of conduct. This policy outlines how to report suspected unethical, illegal, fraudulent or undesirable conduct under the protection and support of Fredon - you can report without fear of intimidation, disadvantage or reprisal.

2. Who is covered?

This policy applies to everyone who performs work for or with Fredon, including:

- all Fredon employees (whether ongoing, temporary, full time, part time or casual) and including apprentices and trainees where employed by Fredon;
- directors and officers of Fredon;
- any person who works for Fredon under a contract, including a consultant, contractor, subcontractor, employee of a contractor or subcontractor or employee of a labour hire company who has been assigned to work at Fredon;
- former employees or officers of Fredon; and
- relatives, dependents and spouses of the individuals outlined above.

In this policy, "Fredon" means one or any of the Fredon entities.

3. What is Reportable Conduct?

Reportable Conduct is where there are reasonable grounds to suspect that a Fredon Director, Manager, another employee, contractor or subcontractor has engaged in, or been involved in activity that:

- constitutes an offence against, or a contravention of, a provision of the *Corporations Act 2001 (Cth)*, *Australian Securities and Investments Commission Act 2001 (Cth)* or the *Australian Charities and Not-for-profits Commission Act 2012 (Cth)*
- constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more
- breaches legislation, regulation and/or company policy
- is illegal or unethical or an act of misconduct
- is potentially damaging to Fredon's reputation
- may cause financial loss to Fredon
- involves an act of harassment, victimisation and/or bullying
- perverts the course of justice
- unreasonably endangers health and safety or the environment and its people
- is dishonest, corrupt or a potential act of bribery
- conceals Reportable Conduct.

For the avoidance of doubt, Reportable Conduct does not include 'personal work-related grievances'.

4. Speak Up Protections

When a person makes a report, we are committed to;

- a) protecting the identity of the person reporting, if they wish to remain anonymous, whilst complying with legal requirements
- b) ensuring they will be protected from reprisal, discrimination, harassment or victimisation

- c) conducting an investigation in accordance with clause 6
- d) ensuring that all files and documents relating to the investigation are secure
- e) providing the protections under Australian tax laws
- f) Where a person makes a report, Fredon will assess the risk of the person being subjected to detriment and may implement interim measures to manage that risk. This may include implementing temporary alternative working arrangements or other measures to support and protect the person, including (but not limited to) providing the person with access to the Employee Assistance Program (EAP) and flexibility to work practices as necessary and relevant.

5. Policy Administration

This document may be rescinded, changed or replaced at any time at the absolute discretion of an authorised delegate of Fredon.

This Policy will be made available:

- To all existing officers and employees by email
- To all new officers and employees with their new starter pack
- On Fredon's intranet and external website.

Breach of this policy will be regarded as misconduct and may result in disciplinary action up to and including summary dismissal.

The terms of this Policy are not intended to be contractual in nature and do not form part of any worker's contract of employment or engagement.

PROCEDURE

6. How to Speak Up

- If you have concerns relating to behaviour or conduct in the workplace Fredon encourages you to first 'speak up' to your immediate Line Manager. If you don't feel this is appropriate you can speak with another Manager of Fredon or a member of the HR (People & Culture) team.
- If you're unsure about making a report, discuss the matter with your Line Manager or the HR (People & Culture) team. Note that Fredon may need to act on the discussion if it pertains to reportable conduct.
- If you do not wish to speak up to anyone within Fredon, we have engaged **Core Integrity** to provide external, third party reporting services. You can contact **Core Integrity** 24 hours a day / 7 days a week in the following ways:



1800 324 775



speakup@coreintegrity.com.au



P.O. Box 895, Darlinghurst NSW 1300

- An employee of Fredon or Core Integrity that receives a disclosure of reportable conduct will maintain confidentiality at all times. A report may be made anonymously.

- If you do not wish to speak up to any of the above, you can contact the regulatory bodies below:

The Australian Securities & Investments Commission	http://www.asic.gov.au/complain
Australian Prudential Regulation Authority	https://www.apra.gov.au/contact-us

- In some circumstances, a Disclosure can be made to a journalist and members of State and Commonwealth Parliaments. These relate to public interest disclosure and emergency disclosures (as covered by legislation). It is important to understand the criteria for making a public interest or emergency disclosure and you should contact an independent legal adviser, or a person or entity specified above before making such disclosures.

7. What happens with a report?

The report will be reviewed and assessed to determine if it constitutes reportable conduct. If it is reportable conduct, disclosures may be referred to **Core Integrity** for investigation.

Investigations will follow a fair process, be conducted in a timely manner and be independent of the person(s) about whom an allegation has been made. Depending on the nature of the report, the investigator may be internal to Fredon or external. If appropriate, feedback will be given to the Whistleblower in relation to the progress and outcome of the investigation.

The investigation will result in a report to the appropriate decision maker. The appropriate decision maker will consider the investigation report and decide what, if any, action is required.

Where a person makes a report, Fredon will assess the risk of the person being subjected to detriment and may implement interim measures to manage that risk. This may include implementing temporary alternative working arrangements or other measures to support and protect the person.