



Whistleblower Policy

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1.0 Introduction

The Group aims to maintain a high standard of legal and ethical business behaviour and create an environment where individuals can make Protected Disclosures and are supported and protected throughout the process.

If there are reasonable grounds to believe that a breach under laws referred to in the whistle-blower provisions of the *Corporations Act 2001* (Cth) has occurred the disclosure may be protected in accordance with this Policy.

2.0 Objectives

The key objectives of this Policy are to:

- Confirm the Group's commitment to maintaining a workplace and business that is free from fraudulent and dishonest activity.
- Foster a culture of honest and ethical behaviour.
- Encourage professional, ethical behaviours and corporate compliance throughout the Group.

The Group understands that these objectives can only be achieved and maintained with the support and commitment of its stakeholders. The expectation is that all stakeholders will conduct themselves in a manner that achieves these key objectives and behavioural standards. Stakeholders should be prepared to draw attention to any behaviour that they have reasonable grounds to believe is in breach of this Policy, so that the conduct can be addressed and investigated as necessary.

3.0 Scope

This Policy is administered by the Executive Manager, People and Culture. This Policy covers Protected Disclosures by any Whistle-blowers (as defined below), and relevantly includes past and present staff, company officers and service providers.

4.0 Definitions

Term	Meaning
Eligible Recipient	A Protected Disclosure can be made to: <ul style="list-style-type: none"> • a member of the People and Culture Team; • a member of the Executive Team e.g. Chief Finance Officer, General Counsel, National Manager WHS or WHS Manager; • the Whistle-blower Hotline Service; • an officer or senior manager of the Group; • an auditor or member of an audit team conducting an audit of the Group; • an actuary of the Group; • ASIC; • APRA; or • A Commonwealth Authority prescribed by the regulations of the <i>Corporations Act 2001</i> (Cth).
Protected Disclosure	A Protected Disclosure is one made by a Whistle-blower to an Eligible Recipient in circumstances where the Whistle-blower has reasonable

	<p>grounds to suspect misconduct or an improper state of affairs or circumstances in relation to the Group, including information that indicates that the Group or an officer or employee of the Group has engaged in conduct that:</p> <ul style="list-style-type: none"> • Constitutes an offence against, or a contravention of, a provision of one of the following: <ul style="list-style-type: none"> ○ the <i>Corporations Act 2001</i> (Cth); ○ the <i>Australian Securities and Investments Commission Act 2001</i> (Cth); ○ the <i>Banking Act 1959</i> (Cth); ○ the <i>Financial Sector (Collection of Data) Act 2001</i> (Cth); ○ the <i>Insurance Act 1973</i> (Cth); ○ the <i>Life Insurance Act 1995</i> (Cth); ○ the <i>National Consumer Credit Protection Act 2009</i> (Cth); ○ the <i>Superannuation Industry (Supervision) Act 1993</i> (Cth); or ○ regulations or other instruments made under those laws. <ul style="list-style-type: none"> • Constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. • Represents a danger to the public or the financial system. • Is prescribed by the regulations of the <i>Corporations Act 2001</i> (Cth).
Simonds/ Simonds Group/ Group	Simonds Group Limited ACN 143 841 801 and each of its related bodies corporate.
Whistle-blower	<p>An individual is an eligible whistle-blower if the individual is or has been any of the following in relation to the Group:</p> <ul style="list-style-type: none"> • an officer; • an employee; • an individual who supplies goods or services or their employee; • an associate; • a relative or dependant of the above, or of their spouse, <p>and makes a Protected Disclosure to an Eligible Recipient.</p>

5.0 Confidentiality

A Whistle-blower can make a Protected Disclosure anonymously.

The Group will endeavour to ensure that in making a Protected Disclosure the confidentiality of the Whistle-blower's identity is maintained. In this regard, unless an exception exists, the Group will endeavour not to disclose the Whistle-blower's identity or any information that is likely to lead to identification.

Exceptions to this include where:

- the Whistle-blower gives consent;
- the Group is required or authorised by law to disclose; and
- it is reasonably necessary for the purpose of investigating the Protected Disclosure.

6.0 Liability

A Whistle-blower who makes a Protected Disclosure, subject to legislative exceptions, cannot be subject to:

- civil, criminal or administrative liability (including disciplinary action) for the making of the Protected Disclosure;
- contractual or any other remedies which may be enforced or exercised against the Whistle-blower based on making the Protected Disclosure;
- the information disclosed in the making of the Protected Disclosure being used against the Whistle-blower as evidence in criminal proceedings or in proceedings for the imposition of a penalty.

However, a Whistle-blower will not be immune from liability if:

- the Whistle-blower has provided false information; or
- wrongful conduct engaged in by the Whistle-blower is revealed by the making of the Protected Disclosure.

7.0 Victimisation

The Group will ensure that a Whistle-blower does not face actual or threatened detrimental conduct because of the Protected Disclosure.

Detrimental conduct may include:

- dismissal;
- injury in the Whistle-blower's employment;
- disadvantageous alteration to the Whistle-blower's position or duties;
- discrimination against the Whistle-blower;
- harassment or intimidation against the Whistle-blower;
- harm or injury to the Whistle-blower, including mental harm; and/or
- damage to the Whistle-blower's property, reputation, business or financial position.

8.0 Supporting the Whistleblower

The Group recognises that Whistle-blowers who make a Protected Disclosure may require support during the handling and investigation of that disclosure. The Group encourages the Whistle-blower and any other party named as a potential wrongdoer in a Protected Disclosure, to utilise the services of the Group's EAP on **1800 808 374**, or alternatively reach out to a member of the People and Culture team via **hradmin@simonds.com.au** for assistance as soon as possible.

Further, the Group will endeavour to ensure that the Whistle-blower, and/or any other party named as a potential wrongdoer in a Protected Disclosure are afforded an opportunity to properly respond to the allegations raised.

9.0 Reporting

For a disclosure to receive protection it must be a Protected Disclosure reported by a Whistle-blower to an Eligible Recipient as defined above.

One way a Whistle-blower can make a Protected Disclosure anonymously is by submitting a report to the external Whistle-blower Hotline Service on:

1800 857 376

This is a dedicated service run independently and separate to the Group where a Whistle-blower can remain anonymous.

A Whistle-blower can also choose to make the Protected Disclosure to another Eligible Recipient as defined above.

10.0 Investigation

While the Group recognises that all Protected Disclosures are unique, it endeavours to provide a fair and thorough fact-finding investigation process, that is appropriate and reasonable to the circumstances surrounding the Protected Disclosure, to ultimately determine what has happened.

The Group expects the Whistle-blower to assist with any investigation if necessary, this may include the Whistle-blower being asked to provide more information.

Where a Protected Disclosure has been made anonymously, the Group may investigate or undertake initial enquiries based on the information provided to it. However, anonymity may prevent the Group from taking the issue further if the Group is not able to obtain further information from the source of the disclosure.

11.0 Access

This Policy is available to the Group's employees and officers on Simnet (Go to Our Policies; People and Culture; Whistle-blower Policy) or request a copy of the Policy by email hadmin@simonds.com.au